

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 [Site terms and Privacy Policy](#) 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: www.carboncreditquality.org

Criterion:	5.3 Robust third-party auditing
Carbon crediting program:	Gold Standard
Assessment based on carbon crediting program documents valid as of:	30 June 2021
Date of final assessment:	20 May 2022
Score:	3.08

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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

- 1 Gold Standard Validation & Verification Body Requirements, Version 2.0, 14 January 2021.
Available: <https://globalgoals.goldstandard.org/109-par-validation-verification-body-requirements/>.
- 2 Gold Standard Principles & Requirements, Version 1.2, 2 October 2019.
Available: <https://globalgoals.goldstandard.org/101-par-principles-requirements/>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 7.1.1.1, page 9: “All approved VVBs shall comply with the Requirements in this document and any other Gold Standard rules, requirements and policies such as Gender Policy of the GS4GG.”
- Provision 2 Source 2, section 2.2.1, page 5: “Gold Standard Certified Project status is achieved by successfully undergoing Verification and performance review (Performance Certification), which means:
- (a) The project has followed a Monitoring Plan approved at the time of Design Certification and has submitted Monitoring Report for Verification.
 - (b) The project and its Certified SDG Impacts have been validated and verified as required by an accredited, approved third party VVB.
 - (c) Following this, the project has been reviewed by Gold Standard and is subject to an over-arching independent review by the Gold Standard Technical Advisory Committee (TAC) and NGO Supporters.
 - (d) Any Certified SDG Impacts stated to have been achieved are real.
 - (e) A project may be issued Certified Impact Statements and Products such as Gold Standard Verified Emission Reductions (VERs). This is subject to successful Performance Certification of the Project’s conformity to applicable Gold Standard Impact Quantification Methodology and Product Requirements.”
- Provision 3 Source 2, section 5.1.14, page 23: “Validation includes a site visit by a VVB who assesses the up-front design and monitoring plan for a Project against applicable Requirements. This includes Validation of:

(a) The Project Documentation including the Project Design Document and Monitoring & Reporting Plan, including any updates to the Key Project Information after Listed Status has achieved.

(b) Any supporting document and evidence to demonstrate conformity to all applicable Gold Standard Requirements.”

Provision 4 Source 2, section 5.1.25, page 24: “Verification may start after:

(a) Project has achieved Gold Standard Certified Design status (it may also be combined with validation, see ‘Combined Design and Performance Certification’), AND

(b) The Project Developer has contracted an eligible VVB, AND

(c) The Project Developer has submitted the Monitoring Report to the VVB, AND

(d) The Project Developer has notified Gold Standard of the commencement of Verification.”

Provision 5 Source 2, section 5.1.26, page 24: “Verification includes a site visit by a VVB who assesses the following against all Gold Standard Requirements including applicable Activity Requirements, Gold Standard Methodology and Product Requirements:

(a) The Monitoring Report (including any updates in Annual Reports)

(b) All supporting evidence and documents included by the Project Developer to demonstrate conformity”

Provision 6 Source 2, section 5.1.36, page 25-26: “The positive conclusion of the Performance Review period shall result in Gold Standard Certified Project status, which means that:

(a) The Project Documentation, supporting documentation and Verification Report are made public via the Impact Registry.

(b) The Project can issue any Gold Standard Certified Products or Impact Statements upon payment of required fee

Assessment outcome

Yes (3 Points).

Justification of assessment

The above documentation clearly specifies that the indicator is fulfilled.

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

- 1 Gold Standard Validation & Verification Body Requirements, Version 2.0, 14 January 2021. Available: <https://globalgoals.goldstandard.org/109-par-validation-verification-body-requirements/>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 7.4.1.1, page 10: “To be eligible to become a GS VVB, a VVB must hold a valid accreditation that is recognised by Gold Standard. The recognised accreditation programmes² are

- ISO 14065 for Greenhouse Gas activities accreditation offered under the ANSI-GS Accreditation Program
- UNFCCC-CDM Accreditation (AIE or DOE status)
- ASI – FSC Certification Body status

Other accreditations may be recognised over time.

Note that certain accreditations provide access to specific certification pathways, as defined in Annexure A.

[Footnote²: Other accreditation programmes may be added to this list in due course (for example further ISO 14064/65 providers). Project developers and/or VVBs may request Gold Standard to investigate and decide whether to approve further such accreditation routes for a fee (Please contact Gold Standard Secretariat for applicable fee schedule). The decision is taken by the GS-TAC with a review period of 8 weeks.]”

Assessment outcome

No (0 Points).

Justification of assessment

Some VVBs found online (<https://globalgoals.goldstandard.org/approved-auditors/>) and listed as accredited by: Assurance Services International (ASI) and the Clean Energy Regulator (Australia) are not members of the International Accreditation Forum (IAF). The indicator is therefore not fulfilled.

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 Gold Standard Validation & Verification Body Requirements, Version 2.0, 14 January 2021.
Available: <https://globalgoals.goldstandard.org/109-par-validation-verification-body-requirements/>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section “Summary”, page 1: “This document contains Gold Standard Validation/Verification Body Requirements for certification under the Gold Standard for the Global Goals and earlier versions of Gold Standard. The principles, rules and requirements set out in this document are applicable to all VVBs and certification bodies that seek to conduct Validations and Verifications for certifying Gold Standard Projects and Programmes.”
- Provision 2 Source 1, section 7.1.1.1, page 9: “All approved VVBs shall comply with the Requirements in this document and any other Gold Standard rules, requirements and policies such as Gender Policy of the GS4GG.”
- Provision 3 Source 1, section 8, page 20: “VALIDATION AND VERIFICATION PROCESS AND REQUIREMENTS”

Assessment outcome

Yes (1 Point).

Justification of assessment

Section 8 of the Validation and Verification Body Requirements does not contain a summary statement identifying that it represents the required elements that a VVB must conduct in completing a validation or verification, but it details the process that must be followed throughout the section. 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 Gold Standard Validation & Verification Body Requirements, Version 2.0, 14 January 2021.
Available: <https://globalgoals.goldstandard.org/109-par-validation-verification-body-requirements/>.
- 2 Stakeholder Consultation and Engagement Requirements, Version 1.2, October 24th, 2019.
Available: <https://globalgoals.goldstandard.org/102-par-stakeholder-consultation-requirements/>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 5.1.1.1, page 5-6: “b. All Gold Standard NGO Supporters and other stakeholders can support the stakeholder consultation process and may be invited to provide input for every project at defined points in the certification process.
- [...]
- e. The project shall have a Monitoring & Reporting Plan, based on the outcome of the Safeguarding Principles Assessment, SDG Impacts Assessment and Stakeholder Consultations. The monitoring parameters shall be regularly monitored, clearly reported on and independently validated/verified.
- f. Independent, accredited validation & verification bodies shall verify that the project meets all rules and that all claims and any calculations are accurate. VVBs must be able to demonstrate and maintain impartiality while conducting validation and verification activities.”
- Provision 2 Source 2, section 7.1.1, page 6: “All projects shall setup a formal input, feedback and grievance mechanism with the purpose of providing stakeholders with an opportunity to submit any feedback or raise grievances during the entire project life.”
- Provision 3 Source 2, section 7.1.2, page 6: “The project shall discuss the potential options with stakeholders and agree on an appropriate method.”
- Provision 4 Source 2, section 7.1.3, page 6: “At a minimum, Continuous Input and Grievance Expression Process Book shall be made available at an agreed location.”
- Provision 5 Source 2, section 8.1.1, page 6: “The Project Developer shall apply a gender lens while assessing the relevance and appropriateness of the stakeholders’ comments.”
- Provision 6 Source 2, section 8.1.2, page 6: “The project shall consider the comments provided by the Stakeholders and report on how the comments have been accounted for. It may also involve changes in the project design, where appropriate. The Project Developer shall provide justifications when any comments have not been incorporated or addressed.”
- Provision 7 Source 2, section 8.1.3, page 6: “The Stakeholders shall be provided with the feedback on how their comments have been taken into account as part of the stakeholder feedback round.”
- Provision 8 Source 2, section 9.1.1, page 6: “Ongoing Monitoring & reporting roject Developer shall provide information in the annual and monitoring report, as applicable, for the following:
- (a) Concerns that have been identified and raised by stakeholders during the stakeholder consultations and the mitigation measures put in place to address those.
- (b) Any feedback given by stakeholders as part of the project’s grievance mechanism”

Assessment outcome

Yes (1 Point).

Justification of assessment

According to the Gold Standard Validation & Verification Body Requirements, the project validation and verification entities are required to audit the Stakeholder Consultations that have been included in the Monitoring & Reporting Plan (Provision 1). Stakeholder Consultations are incorporated robustly into the monitoring and reporting obligations (Provision 8) of project documentation for validation and verification bodies to review. The indicator is fulfilled.

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 may only 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 Gold Standard Principles & Requirements, Version 1.2, 2 October 2019.
Available: <https://globalgoals.goldstandard.org/101-par-principles-requirements/>.
- 2 Rule Update: Validation and verification by same VVB (RU 2020 PR – PR V1.2), 2 April 2020.
Available: <https://globalgoals.goldstandard.org/ru-2020-validation-and-verification-by-same-vvb/>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, 5.1.28, page 25: “Unless otherwise stated (for example in an applied Methodology or Product Requirements), the same VVB may undertake Validation and Verification of a given Project.”
- Provision 2 Source 2, section 2.1, page 1: “The same VVB may undertake the validation/inclusion, verification, crediting period renewal, design change review for a given project seeking Gold Standard for Global Goals certification, irrespective of; Project, programmes or interventions Certification types and pathway, e.g. Gold Standard Certified Impact Statements or Products Project scale, e.g. micro, other scales (large and small scale)”
- Provision 3 Source 2, section 2.2, page 2: “If the same VVB wishes to perform verification of a given project/PoA for which they have performed validation activity (including the inclusion of VPA/CPA, renewal of crediting period, design change review), the VVB shall ensure that the integrity and impartiality of the verification audit are maintained. In such cases, the VVB shall meet the following requirements:

- 1) The VVB shall ensure that the entire verification audit team, including the lead auditors, auditors and sectoral experts, are different from the team that performed the validation activity (including the inclusion of VPA/CPA, renewal of crediting period, design change review).
- 2) The VVB shall transparently disclose in the verification report that the same VVB has performed validation activity (including the inclusion of VPA/CPA, renewal of crediting period, design change review) for the given project/PoA. The VVB shall disclose the details of the audit team, including names of all the team members and their roles in the previous audit performed by the same VVB.”

Assessment outcome

No (0 Points).

Justification of assessment

The Gold Standard Principles & Requirements allow that the same VVB may undertake Validation and Verification of a given Project (Provision 1 and Provision 2). The Rule Update “Validation and verification by same VVB” introduces requirements for VVBs that wish to perform verification for the project/PoAs for which they have performed the validation activity in the past. These rule updates include provisions that set conditions under which the same validation and verification entity may be used: The provisions require an entirely different team of entities conduct the validation and verification (Provision 3). The requirements of the indicator state that restrictions must exist to limit the use of the same validation and verification entity, so the requirement to change the composition of the VVB team does not satisfy this indicator.

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 Monitoring report, 14 October 2020. Available: <https://globalgoals.goldstandard.org/t-perfcert-monitoring-report/>.
- 2 Template Guide Monitoring Report, Version 1.1, 14 October 2020. Available: https://globalgoals.goldstandard.org/standards/TGuide-PerfCert_V1.1-Monitoring-Report.pdf.

- 3 GHG Emissions Reduction & Sequestration Product Requirements, Version 2.0, 1 April 2021. Available: <https://globalgoals.goldstandard.org/501-pr-ghg-emissions-reductions-sequestration/>.
- 4 Clean Development Mechanism Validation and Verification Manual, Version 01, 28 November 2008. Available: https://cdm.unfccc.int/Reference/Manuals/accr/accr_man01.pdf.

Relevant carbon crediting program provisions

- Provision 1 Source 2, section A2, page 7: “Provide details of the physical/geographical location of the project activity, including:
- i. Physical address (host Party, region/state/province, city/town/community, street name and number)
 - ii. a map, iii. if necessary, other information allowing for the unique identification of the project activity (e.g. geographic coordinates)”
- Provision 2 Source 2, section A4, page 7: “Provide the start and end dates (in DD/MM/YYYY – DD/MM/YYYY) and length of the crediting period as given in approved PDD. If the CP start date is wrong in the PDD, the PDD must be updated with the correct information.”
- Provision 3 Source 3, section 1.1.4, page 4: “Unless otherwise indicated in this document or associated documents, all projects applying these Requirements shall be consistent with applicable UNFCCC rules and requirements for Clean Development Mechanism (CDM) or Joint Implementation (JI) projects, as periodically updated.”
- Provision 4 Source 4, paragraph 165, page 31: “The report shall:
- (a) State the DOE’s conclusions regarding the proposed CDM project activity’s conformity with applicable CDM requirements;
 - (b) Give an overview of the validation activities carried out by the DOE in order to arrive at the final validation conclusions and opinion, including a general discussion of details captured by the validation protocol and conclusions related to CDM requirements;
 - (c) Reflect the results of the dialogue between the DOE and the project participants, as well as any adjustments made to the project design following stakeholder consultation. It shall reflect the responses to CARs and CLs, and discussions on and revisions to project documentation.”
- Provision 5 Source 4, paragraph 166, page 32: “The validation report shall provide at least the following:
- (a) A summary of the validation process and its conclusions;
 - (b) All the DOE’s applied approaches, “findings and conclusions, especially on: baseline selection, additionality, emission factors and monitoring”; [footnote: http://cdm.unfccc.int/Reference/Procedures/reg_proc05_v01.pdf]

- (c) Information on the global stakeholders consultation carried out by the DOE prior to submitting the project for validation, including dates and how comments received have been taken into consideration by the DOE;
- (d) A list of interviewees and documents reviewed;
- (e) Details of the validation team;
- (f) Information on quality control within the team/of the validation process;
- (g) Appointment certificates or curricula vitae of the DOE's validation team members."

Provision 6 Source 4, paragraph 212, page 41: "The verification report shall provide the following:

- (a) A summary of the verification process and the scope of verification;
- (b) Details of the verification team;
- (c) Findings of the desk review and site visit;
- (d) All the DOE's findings and conclusions as to whether the proposed CDM project activity has been implemented in accordance with the PDD, the compliance of the monitoring plan with the monitoring methodology, the compliance of monitoring with the monitoring plan and assessment of data and calculation of GHG emission reductions;
- (e) A list of each parameter specified by the monitoring plan and a clear statement on how the values in the monitoring report have been verified;
- (f) Assessment and close out of any CARs, CLs or FARs issued to the project participants;
- (g) Assessment of remaining issues from the previous verification period, if appropriate;
- (h) Conclusion on the verified amount of emission reductions achieved."

Assessment outcome

No (0 Points).

Justification of assessment

The Template Guide – Monitoring Report identifies some of the relevant requirements (Provision 1 and Provision 2) and must be reviewed through validation/verification however this is distinct from the validation/verification report requirements. The GHG Emissions Reduction & Sequestration Product Requirements (Provision 3) identify that consistency with CDM rules are a fallback when not specified within the GS requirements for projects, but not for auditors. Greater specification identifying the provisions that auditors must follow and specific identification of the CDM guidance (or other external guidance) that should be followed should be directly linked within the Gold Standard Program provisions. Therefore, the indicator is not 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 Gold Standard Validation & Verification Body Requirements, Version 2.0, 14 January 2021. Available: <https://globalgoals.goldstandard.org/109-par-validation-verification-body-requirements/>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 7.8.1.1, page 19: “Gold Standard follows a Performance Management approach, designed to accelerate the development of VVB capabilities and to improve the quality and efficiency of certification services under the Gold Standard for Global Goals. This is made up of the following elements:
- a) Review of all VVB/individual expert reports submitted to the SustainCERT during certification.
 - b) Detailed monitoring of the first 3 to 5 engagements for newly approved VVBs/individual experts, including review of work plans, verification teams, risk assessments, reports and findings.
 - c) Provision of immediate feedback on performance as audit engagements are planned, conducted and concluded.
 - d) Annual review of VVB/individual expert competence and performance based on information gathered across the year, with training and assessment to remedy any performance problems.”
- Provision 2 Source 1, section 7.9.1.1, page 20: “A VVB shall establish, document, implement and maintain a quality management system for ensuring and demonstrating consistent implementation and compliance with the requirements outlined in this document.”
- Provision 3 Source 1, section 7.9.1.2, page 20: “A VVB shall periodically update its quality management system, including all documents that form part of it, to reflect any changes in the GS4GG rules and requirements and address the outcomes of internal audits and management reviews.”

Assessment outcome

Yes (1 Point).

Justification of assessment

Provisions 1 to 3 identify that the Gold Standard conducts oversight of its VVB entities. The indicator is therefore fulfilled.

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 Gold Standard Validation & Verification Body Requirements, Version 2.0, 14 January 2021. Available: <https://globalgoals.goldstandard.org/109-par-validation-verification-body-requirements/>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 7.8.1.1, page 19: “Gold Standard follows a Performance Management approach, designed to accelerate the development of VVB capabilities and to improve the quality and efficiency of certification services under the Gold Standard for Global Goals. This is made up of the following elements:
- e) Review of all VVB/individual expert reports submitted to the SustainCERT during certification.
 - f) Detailed monitoring of the first 3 to 5 engagements for newly approved VVBs/individual experts, including review of work plans, verification teams, risk assessments, reports and findings.
 - g) Provision of immediate feedback on performance as audit engagements are planned, conducted and concluded.
 - h) Annual review of VVB/individual expert competence and performance based on information gathered across the year, with training and assessment to remedy any performance problems.”
- Provision 2 Source 1, section 7.9.1.1, page 20: “A VVB shall establish, document, implement and maintain a quality management system for ensuring and demonstrating consistent implementation and compliance with the requirements outlined in this document.”
- Provision 3 Source 1, section 7.9.1.2, page 20: “A VVB shall periodically update its quality management system, including all documents that form part of it, to reflect any changes in the GS4GG rules and requirements and address the outcomes of internal audits and management reviews.”

Assessment outcome

No (0 Points).

Justification of assessment

Provisions 1 to 3 identify that the Gold Standard conducts oversight of its VVB entities. However, no provisions could be identified that issues with VVBs must be reported to the relevant 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 Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism. 30 March 2006. Available: https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf.
- 2 Procedure: Performance monitoring of designated operational entities. CDM-EB58-A01-PROC, Version 4.0, 12 June 2020. Available: https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20200617103751365/Accr_proc02.pdf.
- 3 ANSI program website (<https://anab.ansi.org/greenhouse-gas-validation-verification/how-to-apply>), last accessed on 21 July 2021.
- 4 Accreditation Policy for ANAB Greenhouse Gas Validation / Verification Body Accreditation Program. PUBLIC POLICY GHG-PL-701, Revision 3, 4 March 2021. Available: <https://anabpd.ansi.org/Accreditation/environmental/greenhouse-gas-validation-verification/DocumentDetail?DRId=119>.
- 5 General requirements for FSC accredited certification bodies, v(4-0), FSC-STD-20-001 V4-0EN, 9 November 2015. Available: <https://fsc.org/en/document-centre/documents/resource/280>.
- 6 Gold Standard Validation/Verification Body Requirements, Version 2.0, Publication Date 14/01/2021. Available: <https://globalgoals.goldstandard.org/109-par-validation-verification-body-requirements/>

Relevant carbon crediting program provisions

Provision 1 Source 1, paragraph 20, page 11: “The Executive Board shall:

- (a) Accredite operational entities which meet the accreditation standards contained in appendix A below;
- (b) Recommend the designation of operational entities to the COP/MOP;
- (c) Maintain a publicly available list of all designated operational entities;

- (d) Review whether each designated operational entity continues to comply with the accreditation standards contained in appendix A below and on this basis confirm whether to reaccredit each operational entity every three years;
- (e) Conduct spot-checking at any time and, on the basis of the results, decide to conduct the above-mentioned review, if warranted.”

Provision 2 Source 2, paragraph 5, page 4: “This procedure is not intended to provide for comparative ranking of DOEs, but to indicate the level of performance and compliance of individual DOEs with the CDM requirements. Its implementation should be complemented with system-wide analysis and improvement.”

Provision 3 Source 3: “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 4 Source 4, 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 5 Source 4, 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 6 Source 4, 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 7 Source 4, 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.”

Provision 8 Source 5, section 4.7.2, page 36: “Surveillance evaluations of FSC clients shall take place at least once per calendar year and additionally for chain of custody audits not later than fifteen (15) months after the last audit and may be more frequent depending on factors such as:

- a) the scale of the operation (e.g. the area of a management unit, the quantity of production in the case of a manufacturer, or the value and/or volume turnover in the case of a trader);
- b) the intensity of resource management in the case of a management unit (e.g. the frequency and level of timber harvest);
- c) the complexity of the management system (e.g. the chain of custody control system);

- d) results of risk assessment in the case of group certification;
- e) the ecological or social sensitivity of the resource base to management intervention;
- f) the experience and track record of the operators involved (managers and personnel, contractors);
- g) the number and nature of any nonconformities identified by the certification body;
- h) the number and nature of any complaints submitted by stakeholders.

NOTE: FSC and ASI reserve the right to request higher surveillance frequencies from certification bodies for certain geographical areas or certification services that are deemed “challenging” or are linked to “high” or “specified risk” as the result of an internal risk assessment.”

- Provision 9 Source 5, section 4.7.2, page 36: “The certification body shall assign one (1) or more person(s) to make the certification decision to continue, suspend or withdraw certification based on information collected from surveillance activities and their review.”
- Provision 10 Source 5, section 4.7.3, page 36: “The occurrence of five (5) or more major nonconformities in a surveillance audit shall be considered as a breakdown of the clients’ management system and certification shall be suspended within ten (10) days of the certification decision being taken.”
- Provision 11 Source 5, section 4.7.4, page 36: “The certification body shall suspend certification at latest three (3) months after the closing meeting of a surveillance audit, if a certification decision to maintain the certification cannot be taken due to circumstances beyond the control of the certification body.
- NOTE: Circumstances beyond the control of the certification body may include, but are not limited to, the client or other parties preventing the use of audit findings and/or the delayed or declined acceptance of audit findings or the audit report by the client.”
- Provision 12 Source 5, section 4.7.5, page 37: “The maximum period that certification may remain suspended is twelve (12) months (upon justification and at the discretion of the certification body the timeline may be increased to eighteen (18) months to allow the client to correct nonconformities). After this period, the certification shall be withdrawn, unless all major nonconformities have been successfully corrected and a surveillance audit was conducted in case the timeline of suspension exceeded twelve (12) months.”
- Provision 13 Source 5, section 4.7.6, page 37: “The certification body shall record the certification decision to maintain certification for each surveillance evaluation.”
- Provision 14 Source 6, section 7.8.1.1, page 19: “Gold Standard follows a Performance Management approach, designed to accelerate the development of VVB capabilities and to improve the quality and efficiency of certification services under the Gold Standard for Global Goals. This is made up of the following elements:
- a) Review of all VVB/individual expert reports submitted to the SustainCERT during certification.

- b) Detailed monitoring of the first 3 to 5 engagements for newly approved VVBs/individual experts, including review of work plans, verification teams, risk assessments, reports and findings.
- c) Provision of immediate feedback on performance as audit engagements are planned, conducted and concluded.
- d) Annual review of VVB/individual expert competence and performance based on information gathered across the year, with training and assessment to remedy any performance problems.”

Assessment outcome

No (0 Points).

Justification of assessment

The CDM Executive Board is one of the eligible accreditation bodies under the GS. The CDM has procedures in place to regularly assess the performance of its accredited validation and verification entities. These assessments, however, only cover the performance of accredited entities with regard to their auditing functions under the CDM not the Gold Standard program (Provision 1 and Provision 2). The performance of these entities for GS auditing work is evaluated by the GS (Provision 14). The feedback loop here is convoluted as the entity providing accreditation to CDM DOEs (the Executive Board) is not the entity conducting monitoring and oversight of DOEs conducting auditing within the GS program which undermines the effectiveness of the monitoring. Besides the CDM Executive Board, Active VVBs accredited through ANSI-GS have appropriate procedures in place to periodically assess the performance of validation and verification bodies (Provision 3 to Provision 7). The General requirements for FCS accredited certification bodies also contain accreditation surveillance provisions (Provision 8 to Provision 13). The indicator is not fulfilled due to the CDM DOE’s whose Gold Standard auditing activities are not monitored by their accreditation body.

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 Gold Standard Validation & Verification Body Requirements, Version 2.0, 14 January 2021. Available: <https://globalgoals.goldstandard.org/109-par-validation-verification-body-requirements/>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 7.7.1.1, page 17: “A VVB shall establish, document, implement and maintain a procedure for evaluating its validation and/or verification/certification

personnel, for demonstrating that they have appropriate competence and meet applicable requirements as well as for qualifying and authorising them before they perform validation and/or verification/certification activities.”

- Provision 2 Source 1, section 7.7.1.2, page 17: “The procedure referred to in paragraph 7.7.1.1 above shall:
- a. Include the consideration of the competence criteria, as determined above, and the competence requirements in this Standard;
 - b. Address the qualification of personnel
 - i. For all functions in validation and/or verification/certification activities, i.e. validator, verifier, team leader, technical expert, and technical reviewer;
 - ii. in all technical areas in which the VVB intends to operate or operates, within all sectoral scopes for which the VVB has applied for approval or has been approved;
 - c. Ensure that records of the evaluation-demonstration-qualification-authorisation process are retained”
- Provision 3 Source 1, section 7.7.1.3, page 17: “The VVB shall evaluate and demonstrate competence of its personnel through the following methods, generating objective records how competence was evaluated under each method:
- a. Review of personnel records, mentoring or training; and
 - b. An examination.”
- Provision 4 Source 1, section 7.7.1.4, page 17: “The review of personnel records shall include, but is not limited to, the review of curriculum vitae detailing work experience and education.”
- Provision 5 Source 1, section 7.7.1.5, page 18: “Mentoring activities shall be specific to the relevant function and/or technical area and shall cover the entire spectrum of responsibilities of the relevant function and/or technical area.”
- Provision 6 Source 1, section 7.7.1.6, page 18: “Training programmes shall be designed so as to cover the required knowledge and skills and shall comply with the requirements contained in paragraphs below.”
- Provision 7 Source 1, section 7.8.1.1, page 19: “Gold Standard follows a Performance Management approach, designed to accelerate the development of VVB capabilities and to improve the quality and efficiency of certification services under the Gold Standard for Global Goals. This is made up of the following elements:
- a. Review of all VVB/individual expert reports submitted to the SustainCERT during certification.
 - b. Detailed monitoring of the first 3 to 5 engagements for newly approved VVBs/individual experts, including review of work plans, verification teams, risk assessments, reports and findings.
 - c. Provision of immediate feedback on performance as audit engagements are planned, conducted and concluded.

- d. Annual review of VVB/individual expert competence and performance based on information gathered across the year, with training and assessment to remedy any performance problems”

Provision 8 Source 1, section 7.8.1.3, page 19: “A VVB shall establish, document, implement and maintain a procedure for monitoring the performance of its validation and/or verification/certification personnel to ensure appropriate performance and that their competence is maintained.”

Provision 9 Source 1, section 7.9.1.1, page 20: “A VVB shall establish, document, implement and maintain a quality management system for ensuring and demonstrating consistent implementation and compliance with the requirements outlined in this document.”

Provision 10 Source 1, section 7.9.1.2, page 20: “A VVB shall periodically update its quality management system, including all documents that form part of it, to reflect any changes in the GS4GG rules and requirements and address the outcomes of internal audits and management reviews.”

Provision 11 Source 1, section 8.5.5.1, page 24: “A VVB shall establish, document, implement and maintain a procedure for conducting internal audits of its GS4GG validation and verification/certification functions and those of its outsourced entities in order to verify whether its quality management system is effective and ensure that its operations continue to comply with the GS4GG requirements and its own documented policies and procedures.”

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

- 1 Gold Standard Validation & Verification Body Requirements, Version 2.0, 14 January 2021. Available: <https://globalgoals.goldstandard.org/109-par-validation-verification-body-requirements/>.
- 2 Accreditation Policy for ANAB Greenhouse Gas Validation / Verification Body Accreditation Program. PUBLIC POLICY GHG-PL-701, Revision 3, 4 March 2021. Available:

<https://anabpd.ansi.org/Accreditation/environmental/greenhouse-gas-validation-verification/DocumentDetail?DRId=119>.

- 3 General requirements for FCS accredited certification bodies, v(4-0), FSC-STD-20-001 V4-0EN, 9 November 2015. Available: <https://fsc.org/en/document-centre/documents/resource/280>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 7.8.1.2, page 19: “Persistent and/or serious problems with the performance of a GS VVB/individual expert may result in the Gold Standard revoking the VVB’s/individual expert’s approval or refusing their re-approval.”
- Provision 2 Source 1, section 7.8.1.5, page 19-20: “Where there is evidence that a VVB intentionally provided false information, intentionally omitted to provide information that should have been provided, or deliberately violated any approval requirement, or performs poorly on regular basis, SustainCERT shall promptly submit a draft assessment report. The Gold Standard Secretariat will assess and decide whether to recommend that the TAC suspend or withdraw the approval of the VVB. At this stage, the Secretariat may request the VVB to provide information relating to the alleged conduct.”
- Provision 3 Source 1, section 9.4.9.1, page 32: “The Gold Standard may review and, for good cause, including any violation or any similar action in an analogous GHG system, modify, suspend, or revoke approved GS status granted to the VVB. The Gold Standard shall not revoke the approval status without offering GS-VVB an opportunity for presenting clarification.”
- Provision 4 Source 1, section 9.4.9.2, page 32: “During suspension or revocation proceedings, the GS-VVB may not continue to provide validation/verification services.”
- Provision 5 Source 1, section 9.4.9.3, page 32: “Within 30 days of suspension or revocation of Gold Standard approval, a GS-VVB must notify all stakeholders; including project developers for whom it is provided validation/verification services or has provided validation/verification services within the past 6 months of its suspension or revocation of Gold Standard approval. The notification shall also include information on the course of action to conclude outstanding validations/verifications as agreed with Gold Standard.”
- Provision 6 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 7 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 8 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 9 Source 2, clause 11.4: “The V/VB may request ANAB to reduce or suspend its scope of accreditation or voluntarily withdraw from accreditation.”
- Provision 10 Source 3, section 4.7.2, page 36: “The certification body shall assign one (1) or more person(s) to make the certification decision to continue, suspend or withdraw certification based on information collected from surveillance activities and their review.”
- Provision 11 Source 3, section 4.7.3, page 36: “The occurrence of five (5) or more major nonconformities in a surveillance audit shall be considered as a breakdown of the clients’ management system and certification shall be suspended within ten (10) days of the certification decision being taken.”
- Provision 12 Source 3, section 4.7.4, page 36: ““The certification body shall suspend certification at latest three (3) months after the closing meeting of a surveillance audit, if a certification decision to maintain the certification cannot be taken due to circumstances beyond the control of the certification body.
- NOTE: Circumstances beyond the control of the certification body may include, but are not limited to, the client or other parties preventing the use of audit findings and/ or the delayed or declined acceptance of audit findings or the audit report by the client.”
- Provision 13 Source 3, section 4.7.5, page 37: “The maximum period that certification may remain suspended is twelve (12) months (upon justification and at the discretion of the certification body the timeline may be increased to eighteen (18) months to allow the client to correct nonconformities). After this period, the certification shall be withdrawn, unless all major nonconformities have been successfully corrected and a surveillance audit was conducted in case the timeline of suspension exceeded twelve (12) months.”

Assessment outcome

Yes (1 Point).

Justification of assessment

GS has procedures in place to perform quality controls of registered projects as defined in section 7.8.1 and 9.4.9 of the Gold Standard Validation & Verification Body Requirements (Provision 1 to Provision 5), which would cover CDM EB accredited VVBs. The Accreditation Policy for ANAB Greenhouse Gas Validation / Verification Body Accreditation Program and the General requirements for FCS accredited certification bodies also contain appropriate procedures to apply sanctions against validation and verification entities in cases of performance issues (Provision 6 to Provision13). This indicator is fulfilled.

Scoring results

According to the above assessment, the carbon crediting program receives 8 out of 13 achievable points. Applying the scoring approach of the methodology, this results in a score of 3.08.