



Part 6:
Assessment Procedure

1 Introduction

1.1 Purpose of this document

The Integrity Council for the Voluntary Carbon Market (Integrity Council) is an independent governance body for the voluntary carbon market (VCM). Its purpose is to ensure the VCM accelerates a just transition to 1.5 °C.

It does this by setting a new, definitive global threshold standard for what constitutes high integrity carbon credits, drawing on the best science and expertise available, so carbon credits can contribute to the channelling of finance towards additional, durable and robustly quantified greenhouse gas emission reductions and removals, and contribute to sustainable development.

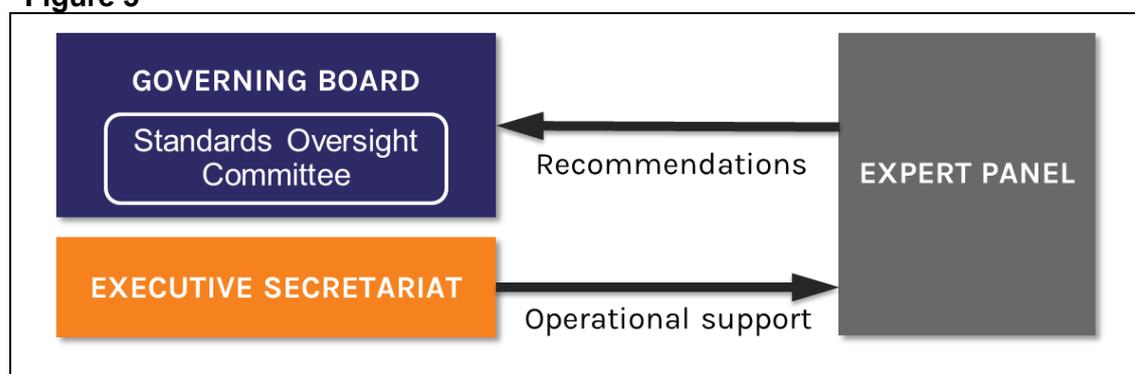
The Integrity Council has a mandate to develop Core Carbon Principles (CCPs) supported by a detailed Assessment Framework, and apply them to identify high-quality carbon credits and to assess carbon-crediting programs. The CCPs and Assessment Framework are living documents. These will further evolve in the light of experience.

This document sets out the procedure for obtaining the Integrity Council’s designation of carbon credits as CCP-eligible.

Broadly speaking, the Integrity Council assesses carbon-crediting programs (such as Gold Standard) and their methodologies (such as for efficient cookstoves) against the CCPs. If Gold Standard is assessed as meeting the program-level elements of the CCPs and a specific version of its cookstove methodology is assessed as meeting the relevant elements of the CCPs, credits of that “credit type” (i.e., credits issued by Gold Standard under that methodology version) are CCP-eligible, and will be tagged as such in Gold Standard’s registry.

1.2 Key components of the Integrity Council’s governance

Figure 5



The key components of the Integrity Council’s governance that are relevant to this Assessment Procedure are shown in the above diagram.

- The Governing Board has overall responsibility for the Integrity Council’s decisions and work. It appoints the leadership of both the Expert Panel and the Executive Secretariat. A Standards Oversight Committee comprising independent members of

the Governing Board oversees the Expert Panel’s work and makes recommendations to the full Board.

- The Expert Panel recommends texts and decisions to the Governing Board in setting and enforcing the CCPs. These are subject to review by the Governing Board.
- The Executive Secretariat provides operational support to the Expert Panel and Board.

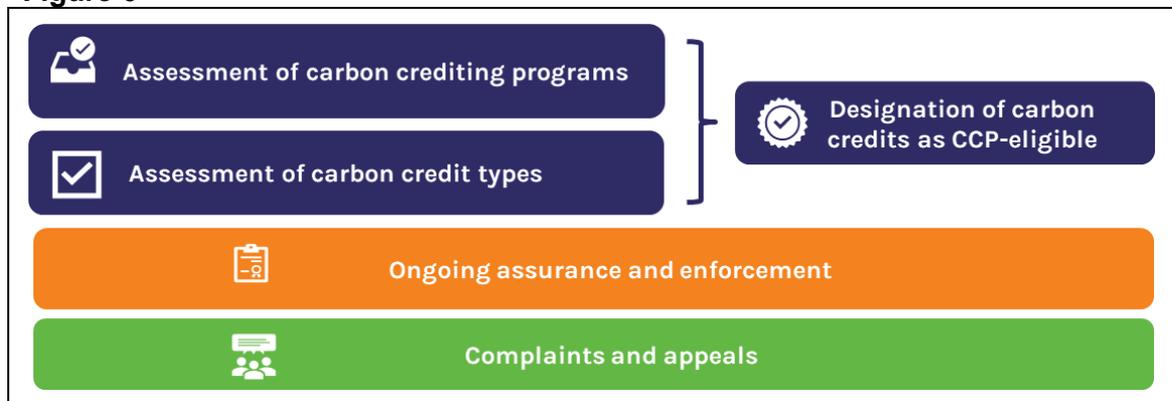
1.3 Definition of Credit Type for the purpose of Assessment

The assessment applies to carbon-crediting programs and their credit types rather than to methodologies. Credit types tend to correspond with methodologies but not one-to-one; e.g., in some cases several types of activity are assessed under one methodology (such as renewable energy from different sources), or other distinctions are needed, e.g., for renewable energy, a distinction might be needed between projects in more and less developed countries. Therefore, for the purposes of this document, the following definition is used:

A credit type is the intersection of a type of mitigation activity quantified using relevant methodologies by a carbon-crediting program, together with any other distinctions necessary.

1.4 Overview of process for awarding CCP-eligibility to carbon credits

Figure 6



The Integrity Council will award the designation of CCP eligibility in three main steps:

- 1) **Assessment of carbon-crediting programs:** The Integrity Council assesses whether carbon-crediting programs satisfy the relevant principles in the CCPs using the program-level criteria in the Assessment Framework. Carbon credits will only be deemed as CCP-eligible if they are issued by a carbon-crediting program that has been assessed by the Integrity Council to fulfil these principles and criteria.
- 2) **Assessment of types of carbon credits:** The Integrity Council assesses whether a type of carbon credit (as defined in section 1.3) meets the relevant principles in the CCPs using the criteria applicable to credit types in the Assessment Framework. Carbon credits will only be deemed CCP-eligible if they belong to a

credit type that has been assessed by the Integrity Council to fulfil these principles and criteria.

- 3) **Identification of CCP-eligible carbon credits:** Following the completion of the previous two steps in respect of a program and a credit type, the issuing program will identify which specific carbon credits are CCP-eligible and tag them as such in its registry together with any relevant attributes. The identification and tagging by carbon-crediting programs will be overseen by the Integrity Council.

Assessment of a program will tend to precede assessment of its credit types, but the Integrity Council may at times choose to assess certain credit types before the issuing program has been assessed as fulfilling the CCPs, in which case the CCP-eligibility of those credit types will remain pending until completion of the program-level assessment.

The programs will investigate issues and any complaints and run a grievance mechanism, sharing details with the Integrity Council. The Integrity Council in its Ombudsman role reserves the right to investigate and assess the effectiveness of resolution by a program.

The Integrity Council will handle any complaints or appeals about its own process as set out in section 6 below.

1.5 Phased Approach

The Integrity Council is adopting a phased approach to implementation of the CCPs whereby it sets the following:

- an initial threshold for carbon credits with consistent and comparable atmospheric, environmental and social integrity in line with current good practice; and
- a clear transparent pathway for carbon-crediting programs and credit types to level up to the full stringency requirements as set out.

The Assessment Framework sets out the initial and full stringency requirements for each CCP.

1.6 Definitions

The definitions set out in the draft Assessment Framework apply to this draft procedure. This procedure should be read in conjunction with the draft Core Carbon Principles (CCPs) and the draft Assessment Framework of the Integrity Council.

1.7 General principles applicable to this procedure

While the Integrity Council assesses carbon-crediting programs and carbon credit types against the principles and criteria set out in the draft CCPs and the draft Assessment Framework, it will not only consider these provisions but also respond to how they are implemented and the extent to which they are enforced in practice.

2 Assessment of carbon-crediting programs

This section describes how the Integrity Council assesses carbon-crediting programs against the CCPs and the requirements in part I of the draft Assessment Framework.

Question:

Should the Integrity Council reserve the right by exception to assess programs unsolicited, at its own discretion, based on publicly available information?

2.1 Application by a carbon-crediting program to the Integrity Council

2.1.1 Who can apply

Any carbon-crediting program can apply to the Integrity Council for assessment of its program. Approval of the program is necessary but not sufficient for awarding CCP-eligibility to carbon credits issued by that program.

2.1.2 What information needs to be submitted

The program will be invited to complete and submit a self-assessment using the Integrity Council's self-assessment questionnaire, supported by appropriate evidence and documentation.

2.1.3 Where the information is to be submitted

Programs should submit the self-assessment and any supporting evidence and documentation via the [Secure Upload Portal].

2.1.4 When the information may be submitted

Any program that wishes to be assessed should first notify the Integrity Council of its intention to apply by emailing [application@icvcm.org]. The Integrity Council secretariat will provide the program with login instructions for the secure upload portal no later than [5] working days following the notification. The secretariat will also endeavour to provide an estimate of potential timescale to perform the assessment once the application is completed, based on current workload.

2.1.5 Confidentiality

All the information received will solely be used for the intended purpose of assessing the programs against the Assessment Framework.

The submission will be made public, subject to any redactions agreed between the Integrity Council and the program where there is a compelling rationale for confidentiality, and stakeholder comments will be invited in line with the market's public purpose – see section 2.2.3 below.

The Integrity Council's draft assessment will be treated as confidential during the course of the assessment. Once a decision has been reached, the Integrity Council will publish its rationale.

2.2 Processing of applications

2.2.1 Indicative timeline from receipt of application until final decision

The Integrity Council will aim to issue its decision within [X] [four] months of receipt of the completed application, although this could take longer during busier periods. The applicant program will be informed if the assessment is expected to take longer due to a high workload or due to other delays such as provision of feedback or further evidence by the applicant program.

2.2.2 Completeness check

On receipt of an application, the Integrity Council will perform an initial completeness review of documentation submitted, and raise any gaps with the program, or confirm that the application is complete and proceed to the assessment stage.

The Integrity Council will process complete applications in the order in which they are confirmed as complete. It may initiate an assessment at its own discretion at any time.

2.2.3 Publication of the submission and soliciting comments from stakeholders

In line with its Governing Principles of Inclusivity and Transparency, the Integrity Council will publish the submission by the carbon-crediting program on its website, after the application has been confirmed as complete.

The Integrity Council will open a window for a duration of six weeks for stakeholders to provide input on the program to be assessed. During this window, any stakeholder may submit comments to the Integrity Council on whether the applicant program conforms to the relevant principles and criteria set out in the draft CCPs and draft Assessment Framework.

Comments submitted by stakeholders during this window will be considered by the Integrity Council during its assessment alongside the documentation submitted by the program and gathered by the Integrity Council.

2.2.4 Assessment of submission

The Executive Secretariat will prepare a draft assessment report and submit this to the Expert Panel for its consideration. The draft assessment will be based on any self-assessment submitted by the carbon-crediting program and an assessment of the normative program documents of the carbon-crediting program and, where applicable, other relevant documentation. The Expert Panel will consider and, as necessary, revise or amend the draft assessment prepared by the Executive Secretariat.

2.2.5 Interactive process to clarify issues and any further actions

The draft assessment report will then be made available to the applicant program to seek feedback from the program.

The Executive Secretariat and members of the Expert Panel will engage in dialogue with the program to present issues identified from the draft assessment and seek any further input. Programs may submit additional evidence and rationale and may propose remedial actions for consideration by the Expert Panel.

Records of any meetings (including meeting minutes) will be documented accordingly in line with the Integrity Council's internal governance procedures.

2.2.6 Decision-making within the Integrity Council

Based on the outcome of 2.2.4 and 2.2.5, the Expert Panel will finalise its assessment report.

Records of meetings (including meeting minutes) will be documented in line with the Integrity Council's internal governance procedures.

The assessment by the Expert Panel will include a recommendation on whether to (a) approve the program for CCP eligibility, (b) approve the program for CCP eligibility subject to conditions, such as the implementation of remedial measures by the program, or (c) reject the program for CCP eligibility. Conditional approval will only be granted by the Integrity Council in the event that the only gap(s) identified are considered by the Integrity Council to be minor (such as a limited procedural change required to governance) and that a robust remediation plan, supported by an acceptable timeline and resourcing plan, is in place.

Question:

The Integrity Council is considering the use of conditional approval to expedite initial threshold uptake, where a program can commit within a precise timeframe to fully implement initial threshold requirements. During such timeframe, carbon-crediting programs will be granted CCP-approved status. When and how should pledges or commitments be presented, monitored and what sanctions should apply in case of non-fulfilment?

The final assessment report and recommendation by the Expert Panel shall be submitted to the Governing Board for approval.

2.2.7 Notification and publication

The Integrity Council will publish the final decision on the application, including the final assessment report and any agreed remediation actions and the program's timeline for these.

2.2.8 Duration of program approval, or any conditions attached

The draft Assessment Framework sets out initial and more stringent requirements as described in section 1.5 above.

Approval against initial requirements will be dependent on a commitment by the applicant program to take all reasonable steps to meet the more stringent requirements in a timely manner.

Approval of the program against initial requirements is valid until any of the relevant initial requirements are phased out. By that time, the program would need to have been assessed by the Integrity Council as satisfying the corresponding more stringent requirements.

Approval of the program against more stringent requirements is valid for five years.

During the 12 months preceding expiry of the current approval, the program will be invited to submit an updated application for assessment.

In addition, in the event of a material change, the Integrity Council will consider whether an interim review will need to be conducted. See section 2.3.1 for further detail.

2.3 Post-approval activities

2.3.1 Material changes at a program

An approved program should notify the Integrity Council if it anticipates, or has implemented, a material change in its governance, normative program documents or practice (such as a merger or transfer of decision-making powers). The program should notify the Integrity Council no later than 2 weeks after the adoption of any material change.

2.3.2 Performance monitoring by the Integrity Council secretariat

It is the program's responsibility to continue to implement its governance and normative program documents that have formed the basis for approval of CCP eligibility. The Integrity Council may monitor the performance of the program through review of data, market intelligence and reviewing issues and themes that arise through the program's own oversight and grievance mechanisms and any operated by the Integrity Council (see section 5 below).

2.3.3 Interim review triggers and process

The Integrity Council may initiate an interim review at its discretion if it becomes aware of a material change or if it has cause to suspect material failings.

In these cases, the Executive Secretariat will analyse the subject matter and provide an assessment to the Expert Panel, including a recommendation on whether a review is required and if so the terms of the review. The Expert Panel will consider the matter and provide a recommendation to the Governing Board of the Integrity Council for decision-making on this matter, including the proposed scope and modalities of the interim review, for example reperforming a section of the Assessment Procedure.

2.3.4 Suspension of CCP eligibility of a program

The Integrity Council reserves the right to suspend the CCP eligibility of a program to ensure integrity is maintained in the market. Such a decision would be made by the Governing Board based on a recommendation of the Expert Panel supported by analysis by the Executive Secretariat.

While the CCP-eligibility of a program is suspended, the program is not permitted to award CCP-eligibility to new projects until the suspension is revoked.

Circumstances under which CCP-eligible designation may be suspended include but are not limited to the following:

- non-disclosure by the program under 2.3.1 above of a material change;
- reasonable grounds for the Integrity Council to believe the program is failing to apply its approved process and governance in a way that would potentially lead to material breach of the draft Assessment Framework criteria;
- material failure to cooperate with the Integrity Council's investigations and reasonable requests in pursuit of its mandate and in line with its published processes;
- in cases where a conditional approval was granted, failure to implement any remedial measures within the specified timeframe;
- failure to rectify material errors or ensure that reversals are compensated (e.g., through retirement of credits from a buffer); and
- poor conduct, e.g., obstruction, discrimination, non-disclosure of material facts, publishing or allowing to be released misleading information.

In the event that the Integrity Council Governing Board determines that suspension is appropriate, this will be notified to the program together with the grounds for the suspension and the condition to be satisfied for the suspension to be lifted. Within [two] working days of the notification to the program, the suspension will be published on the Integrity Council's website.

As and when the relevant condition(s) are fulfilled, the program may apply to the Integrity Council to have the suspension lifted, presenting appropriate evidence to the Secretariat. When the Governing Board is satisfied that the conditions are fulfilled, it will notify the program and publish the lifting of the suspension on the Integrity Council's website.

2.3.5 Termination of CCP eligibility of a program

Circumstances under which CCP-eligible designation may be terminated include but are not limited to the most severe examples of the suspension circumstances listed in which put in doubt the program's competence, conduct and/or commitment to high integrity in the VCM, in the opinion of the Governing Board of the Integrity Council.

The Integrity Council reserves the right to terminate the CCP eligibility of a program to ensure integrity is maintained in the market. Such a decision would be made by the Governing Board based on a recommendation of the Expert Panel supported by analysis by the Executive Secretariat.

The termination of CCP-eligible designation means that no further credits from new activities or from existing activities that have issued CCP-eligible credits will be designated as CCP-eligible.

As a last resort under the most exceptional circumstances, for example in case of material fraud, the Integrity Council reserves the right to apply the termination retroactively. This could include removal of CCP-eligible status from credits already issued but not yet retired or cancelled, as part of ex-post enforcement and resolution.

3 Assessment of carbon credit types

3.1 Selection of carbon credit types for assessment

Assessment of credit types will be performed in parallel streams organised by broad category (e.g., renewables or forestry). The Standards Oversight Committee will select credit types to assess in turn within each category.

The selection will be based on a recommendation from the Executive Secretariat applying the prioritisation criteria in section 3.2 and informed by advice from the Expert Panel. It will prioritise credit types issued by programs that have applied for accreditation.

The Integrity Council may at their absolute discretion also assess credit types issued by programs that have not yet applied, in the interests of efficiency and/or benchmarking.

3.2 Prioritisation criteria for assessing credit types by the Integrity Council

The prioritisation criteria for the purposes of assessing credit types are:

- a) market share informed by:
 - current mix, e.g., based on last 2 years' issuance; and
 - forward-looking mix, based on recent registrations and investments;
- b) pace of execution - balancing activity types with a likely swifter decision with more complex types; and
- c) net zero transition – potential to accelerate transition to global net zero emissions.

The prioritisation criteria will also seek to achieve a balanced coverage of credit types over time in line with the key components of the Integrity Council's stated mission:

- accelerating innovation and uptake of emerging breakthrough technology;
- protecting and promoting nature and biodiversity; and
- delivering sustainable development co-benefits.

The Integrity Council will be transparent on prioritisation, publishing its rolling decisions on which carbon credit types it has prioritised and plans next to assess.

Priority will be given to credit types where the assessment is due for renewal (see section 3.3.8 below), as soon as this is applicable.

3.3 Process of assessing carbon credit types

3.3.1 Additional Asset-Type Guidance

The draft Assessment Framework is intended to be sufficient to act as a basis for reaching a decision on most credit types (as defined in section 1.3). In the case of some credit types, the Integrity Council may decide whether to develop additional specific guidance before it can reach a decision.

3.3.2 What information will be used

The credit type will be assessed based on the most current version of the normative information of the program and on current methodology version(s) applied by the program to the credit type at the time of the Integrity Council performing its assessment.

3.3.3 Assessment by the Expert Panel

The eligibility of the selected carbon credit types will be assessed against section A of the draft CCPs and Part II of the draft Assessment Framework. These assessments will be undertaken by the Expert Panel, leading to recommendations by the Expert Panel to the Governing Board in relation to the acceptability of types of carbon credits as issued by certain carbon-crediting programs.

The Expert Panel may recommend that the CCP eligibility of types of carbon credits is subject to further conditions that would need to be assessed for each mitigation activity. Such conditions may, for example, relate to characteristics of the mitigation activity or process requirements (e.g., only mitigation activities that have undergone a local stakeholder consultation prior to their implementation).

3.3.4 Soliciting comments from stakeholders

Ahead of or during the initial stages of assessment of a credit type, the Integrity Council will notify stakeholders of which credit types it will next assess, based on the process described in 3.2 above.

The Integrity Council will open a window for a duration of six weeks for stakeholder input on the credit type to be assessed. During this window, any stakeholder may submit comments to the Integrity Council on whether the selected credit type conforms with the relevant principles and criteria set out in the Core Carbon Principles and Assessment Framework.

Comments submitted by stakeholders during this window will be considered by the Integrity Council during its assessment alongside the documentation gathered by the Integrity Council.

3.3.5 Interactive process with carbon-crediting programs

The draft assessment report will be made available to the issuing program to seek feedback from the program.

The Executive Secretariat and members of the Expert Panel will engage in dialogue with the issuing program around issues identified from the draft assessment and seek any further input. The issuing program may submit additional evidence and rationale and may propose remedial actions for consideration.

3.3.6 Confidentiality

All the information received will solely be used for the intended purpose of assessing the programs against the assessment framework.

The Integrity Council's draft assessment will be treated as confidential during the course of the assessment. Once a decision has been reached, the Integrity Council will publish its rationale.

3.3.7 Final decision-making process

Based on the outcome of steps 3.3.3 to 3.3.5, the Expert Panel will finalize its assessment report.

Records of meetings (including meeting minutes) will be documented in line with the Integrity Council's internal governance procedures.

The final assessment report and recommendation by the Expert Panel, including any conditions, will be submitted to the Governing Board for approval.

The Integrity Council will publish decisions on CCP eligibility of credit types. Where there is a significant volume of existing credits to be tagged as a result of the decisions, to reduce scope for speculative trading, the Integrity Council may keep the decision confidential for a short period while the credits are tagged, and coordinate with the program to publish the decision at the same time as the tagging of the relevant credits is to go live in the registry.

3.3.8 Duration of CCP-eligibility of a credit-type, or any conditions attached

The draft Assessment Framework sets out initial and more stringent requirements as described in section 1.5 above.

Approval of a credit type as CCP-eligible against initial requirements will be dependent on a commitment by the issuing program to take all reasonable steps to meet the more stringent requirements in a timely manner.

Approval of the credit type against initial requirements is valid for new projects until any of the relevant initial requirements are phased out. Such projects may continue to issue CCP-eligible credits until the end of their crediting period. After phase-out of initial requirements, the credit-type is only valid for new projects once it has been assessed by the Integrity Council as satisfying the corresponding more stringent requirements.

Approval of a credit type against the more stringent requirements will be valid for five years.

In the event of a material change or material issues arising (see 2.3.2 above), the Integrity Council will consider whether an interim review will need to be conducted.

During the 12 months preceding expiry of the current approval, the Integrity Council will aim to perform an updated assessment of the relevant credit-type.

In addition, in the event of a material change, the Integrity Council will consider whether an interim review is necessary. See section 3.4.1 for further detail.

3.4 Post-approval activities

3.4.1 Material changes to a credit type

An approved program should notify the Integrity Council if it anticipates, or has implemented, a material change in its requirements, methodologies or practice in respect of a credit type assessed by the Integrity Council as CCP-eligible. A material change is one that could reasonably be expected to affect the Integrity Council's assessment decision. The program should notify the Integrity Council no later than 2 weeks after the adoption of any material change.

3.4.2 Performance monitoring by the Integrity Council secretariat

It is the program's responsibility to continue to implement its methodologies and practice that have formed the basis for approval of certain credit types as CCP-eligible. The Integrity Council reserves the right selectively to monitor the performance of credit types. Monitoring will be risk-based and may be carried out through review of data, market intelligence and reviewing issues and themes that arise through the program's own

oversight and grievance mechanisms and any operated by the Integrity Council (see section 5 below).

3.4.3 Interim review triggers and process

The Integrity Council may initiate an interim review of a credit type at its discretion if it becomes aware of a material change or if it has cause to suspect material failings based on performance monitoring or on a significant market event.

The Expert Panel will consider the matter and provide a recommendation to the Governing Board of the Integrity Council for decision-making, including the proposed scope and modalities of the interim review.

3.4.4 Suspension of CCP eligibility of a credit-type

The Integrity Council reserves the right to suspend the CCP eligibility of a credit-type to ensure integrity is maintained in the market in line with its stated mission. Such a decision would be made by the Governing Board based on a recommendation of the Expert Panel supported by analysis by the Executive Secretariat.

In the event of a suspension of the CCP-eligibility of a credit-type (as defined in section 1.2 above), no new activities may have credits awarded CCP-eligibility under that credit-type until the suspension is revoked.

Circumstances under which CCP-eligible designation may be suspended include but are not limited to the following:

- non-disclosure by the program under 2.3.1 above of a material and potentially adverse change in respect of that credit-type;
- reasonable grounds for the Integrity Council to believe the program is failing to apply its requirements, methodologies or practice in respect of that credit type in a way that would potentially lead to material breach of the Assessment Framework criteria;
- material failure to cooperate with the Integrity Council's investigations and reasonable requests in pursuit of its mandate and in line with its published processes;
- in cases where a conditional approval was granted, failure to implement any remedial measures within the relevant timeframe; and
- failure to rectify material errors or ensure that reversals are compensated within the relevant timeframe.

In the event that the Integrity Council Governing Board determines that suspension of a credit-type is appropriate, this will be notified to the issuing program together with the grounds for the suspension and the condition to be satisfied for the suspension to be lifted. Within [two] working days of the notification to the program, the suspension will be published on the Integrity Council's website.

As and when the relevant condition(s) are fulfilled, the program may apply to the Integrity Council to have the suspension lifted in respect of that credit type, presenting appropriate evidence to the Secretariat. When the Governing Board is satisfied that the conditions are fulfilled, it will notify the issuing program and publish the lifting of the suspension on the Integrity Council's website.

3.4.5 Termination of CCP eligibility of a credit-type

The Integrity Council reserves the right to terminate CCP eligibility of a credit type to ensure integrity is maintained in the market in line with its stated mission. Such a

decision would be made by the Governing Board on the recommendation of the Expert Panel.

The termination of CCP-eligible designation means that no further credits from new activities or from existing activities of that credit-type that have issued CCP-eligible credits will be designated as CCP-eligible.

Circumstances under which CCP-eligible designation may be terminated include but are not limited to more severe examples of the suspension circumstances listed in 2.3.4 and 3.3.4 above.

Under the most exceptional circumstances, for example in case of material fraud, the Integrity Council reserves the right as a last resort retroactively to remove the CCP-eligible status of credits already issued but not yet retired or cancelled, as part of ex-post enforcement and resolution.

3.4.6 Consequences of suspension or termination of CCP eligibility of a credit-type

Provisions in this section will be elaborated at a later stage.

[In the event of a suspension of CCP-eligible designation of a credit-type, no new activities may have credits awarded CCP-eligibility under that credit-type until the suspension is revoked.]

[The termination of CCP-eligible designation means that no further credits from new activities or from existing activities of that credit-type that have previously issued CCP-eligible credits will be designated as CCP-eligible.]

Under the most exceptional circumstances, for example in case of gross violation of safeguards, the Integrity Council reserves the right as a last resort retroactively to remove CCP-eligible status of credits already issued but not yet retired or cancelled, as part of ex-post enforcement and resolution.

4 Applying Assessment Decisions

4.1 Designation of specific carbon credits as CCP-eligible

Specific carbon credits issued by a program will be designated as CCP-eligible where the following conditions are met:

- the issuing carbon-crediting program has been determined by the Integrity Council as CCP-eligible;
- the specific carbon credit belongs to a credit type that has been determined by the Integrity Council as CCP-eligible; and
- any further conditions for the eligibility of the carbon credit type, as determined by the Integrity Council in its decision on eligibility of the credit type, are satisfied for the specific carbon credits in question.

Carbon credits shall be designated as meeting the initial requirements or the more stringent requirements set out in the Assessment Framework (see section 1.5 above).

4.2 Identification and tagging of carbon credits

4.2.1 Summary of process

Each program will work with its registry to identify the relevant credits to be tagged as CCP-eligible, including relevant attributes under the CCPs.

Where there are existing credits that qualify as CCP-eligible, the decision and tagging will be published in coordination with the registry in order to minimize the risk of disorderly market trading.

4.2.2 Identification of CCP-eligible carbon credits

Once the Integrity Council has determined which types of carbon credits under which conditions meet the CCP-eligible status, the program will be able to identify which credits are CCP-eligible in accordance with the decision as well as which attributes apply to those credits.

[In many cases, the relevant information will already be available. Where this is not the case, the program may need to perform an audit to inform accurate identification.]

The program shall capture a documentation trail of the identification process, including how it was performed and the information used.

4.2.3 Provisional tagging of CCP-eligible carbon credits

The carbon-crediting program shall be responsible for accurate tagging of CCP-eligible status in the registries.

The program shall instruct the relevant registry to prepare tagging of the relevant credits as CCP-eligible and tagging of the appropriate attributes for those credits.

4.2.4 Integrity Council Assurance over Accuracy of Provisional Tagging

The Secretariat of the Integrity Council will be responsible for designing and carrying out assurance over the tagging of CCP-eligibility and attributes is accurate. This assurance may also involve members of the Expert Panel.

In designing the assurance, the Integrity Council will seek to achieve high confidence that credits are tagged accurately. The Integrity Council may place reliance on information in the relevant registry concerning the credits.

Assurance may include the following steps:

- walk-through with the program of the identification process undertaken;
- scrutiny of the audit trail of the identification process and information used;
- positive confirmation: selection of a sample of tagged credits for review. These credits will be reviewed to confirm that they match the type and conditions specified in the decision. They will also be reviewed for accuracy of attributes. The sampling methodology may include:
 - random selection from groups that are representative of different characteristics or features that are significant for the set of relevant credits and their tagging; and
 - Inclusion of any outliers identified through data analysis of the set of relevant credits.
- negative confirmation: a selection of tests may be performed through data analysis of the set of tagged credits to ensure that credits that do not match the credit type and conditions specified in the decision in various respects are not included.

In the event that any incorrect tagging is identified, the Integrity Council will seek confirmation that the issue has been corrected for all relevant credits and may extend its sample and/or perform follow-up assurance as it deems appropriate.

The secretariat will prepare an assurance report for approval by the co-chairs of the Expert Panel.

4.3 Publication of Decision and Tagging

Where there are existing credits that qualify as CCP-eligible, the registry will coordinate with the secretariat to publish the decision and the tagging of the credits at an agreed time.

4.4 Subsequent Correction of Tagging

If any incorrect tagging is identified, the issuing program is responsible for notifying its registry and ensuring the errors are rectified as soon as possible and in no longer than [5] working days. The registry is responsible for notifying the owner of the affected credits. The Integrity Council should be notified once these rectification steps are completed.

5 Ongoing Assurance and Enforcement

5.1 Investigations

The Integrity Council seeks to promote transparency which encourages greater scrutiny of activities and programs and allows issues to come to light.

Programs are responsible for identifying and investigating issues as they arise, such as reports of non-performance of an activity, or of reversals, or a pattern of evidence implying weakness in a verification process. The Integrity Council will oversee this process and look to share learnings and foster continual improvement.

The framework is set out below.

- CCP-eligible programs shall be open with the Integrity Council on issues and resolution
- In most cases, any investigation will be led by the program; however, the Integrity Council reserves the right to investigate. The Integrity Council may raise issues or request or perform spot-checks, on a risk-based approach informed by market intelligence, thematic analysis and grievances raised
- The Integrity Council will consider adequacy and effectiveness of resolution and improvement actions arising from investigations.

5.2 Sharing Lessons and Continual Improvement

The Secretariat will maintain a log of issues arising that it identifies or that are notified to it.

Periodically it will review the log and compile lessons learned that could be useful to share across the market. These will be subject to review by Expert Panel and Board for dissemination across the market.

The Secretariat will also review the log for potential common themes or trends, and consider with the Expert Panel and Board whether any follow-up analysis or market communication is appropriate in order to drive continual improvement, or update of the CCPs, Assessment Framework or other documents and processes in order to address the thematic issue.

5.3 Grievance Mechanisms

Programs will operate an independent grievance mechanism for those affected by a carbon activity, as set out in the Governance section of the draft Assessment Framework.

The Integrity Council will act as Ombudsman, to which a stakeholder can appeal when they have exhausted the grievance mechanism of the program. The Integrity Council will seek to ensure that the program has operated its grievance mechanism in line with the draft CCPs and draft Assessment Framework.

In the case of an appeal concerning alleged shortfalls or reversals of climate mitigation that has not been resolved by the program, the Integrity Council will engage with the program to understand how this has been investigated and ensure that where appropriate any actual or likely shortfall is compensated (e.g., through retirements of buffer credits).

The Integrity Council's enforcement powers will include the prerogative to publish findings and required improvements and to suspend or withdraw accreditation of a program (see 2.3.4 above).

6 Complaints and Appeals

6.1 Principles

In line with its Governing Principles of Inclusion, Transparency and Continual Improvement, the Integrity Council encourages feedback from any stakeholders.

The Integrity Council is committed to maintaining high integrity in its processes, and receiving feedback or complaints that enables it to improve.

6.2 Feedback

Feedback on the Integrity Council's work is welcome at any time and may be submitted to info@integritycouncil.org, including the word "feedback" in the subject line of the email.

Feedback will be acknowledged within 5 working days. Unless it is identified as urgent on receipt, feedback will be reviewed monthly.

6.3 Complaints

6.3.1 Submission of a Complaint

Complaints about the Integrity Council's execution of its mandate and associated governance and processes may be submitted to info@integritycouncil.org, including the word "complaint" in the subject line of the email. All information received will be treated as confidential.

Complaints should be made as soon as possible, as it might be harder to resolve complaints fairly or satisfactorily after a significant delay.

6.3.2 Responding to a Complaint

The secretariat will aim to acknowledge the complaint within 5 working days and to investigate and respond within 20 working days. If it will require a more complex review or investigation with a longer time-frame, including cases involving third parties, the secretariat will inform the complainant of this.

6.4 Appeals of Integrity Council decisions

6.4.1 Submission of an Appeal

The assessment process is interactive between the Integrity Council and the issuing program, as set out in sections 2 and 3. Therefore, it is expected that in many cases differences of fact or judgement will be understood and accepted or resolved as appropriate.

If a stakeholder has a material concern that the Integrity Council failed to follow its procedure or draft Assessment Framework in reaching an assessment decision on a program or credit type, an appeal may be made to the Governing Board.

Appeals may be submitted to info@integritycouncil.org, including the word “appeal” in the subject line of the email, specifying the perceived material lapse. All information received will be treated as confidential during consideration of the appeal.

6.4.2 Responding to an Appeal

The Secretariat will aim to acknowledge the appeal within 1 working day and to notify the appellant within 5 working days of the process.

The Secretariat will provide notification of the appeal promptly to the Governing Board.

The Secretariat will perform an initial assessment of the appeal and its grounds, seeking input from the Expert Panel as appropriate, for submission to the Governing Board. The Governing Board will determine what steps to take including any further investigation.

If the appeal will take longer than [one calendar month] to resolve, the Secretariat will keep the appellant/s informed of progress.

The Governing Board of the Integrity Council will decide whether to revise its previous decision or reject the appeal. This decision is final. If the decision is to change the outcome or the rationale for an assessment, the revision will be published together with the reasons for it, including the fact of the appeal.

6.5 Post-Complaints Monitoring and Learning

All formal and informal complaints and appeals will be centrally logged and monitored. A periodic summary of complaints, identifying trends, patterns, learning opportunities and any improvement made or required in the quality of the Integrity Council’s processes and outcomes will be prepared for the Governing Board, so that the Integrity Council can learn continually from what it does, how it does it and what works and what does not work. This information will not necessarily be available to the public.

ENDS