



THE INTEGRITY COUNCIL
FOR THE VOLUNTARY CARBON MARKET

SECTION

6

ASSESSMENT PROCEDURE

July 2023

SECTION 6

1 INTRODUCTION	112
2 ASSESSMENT OF CARBON-CREDITING PROGRAMS	115
3 ASSESSMENT OF CATEGORIES	119
4 APPLYING ASSESSMENT DECISIONS	123
5 ONGOING ASSURANCE AND ENFORCEMENT	125
6 HEARINGS, INDEPENDENT REVIEW, COMPLAINTS	132

1 INTRODUCTION

Purpose of this Assessment Procedure

- 1.1 This document sets out the procedure for carbon-crediting programs to be assessed as CCP-Eligible programs and for the assessment of Categories of carbon credits (Categories) as CCP-Approved so that CCP-Eligible programs are able to tag CCP-Approved carbon credits. It also identifies how CCP-Approved carbon credits may, where they meet the requirements in the CCP Attributes section of the Assessment Framework, be tagged in respect of such attributes. This Assessment Procedure should be read in conjunction with the Summary for Decision Makers, Assessment Framework, Definitions, which apply to this Assessment Procedure, and Terms and Conditions. Readers may also wish to review the Introduction and Feedback Statement.
- 1.2 The Integrity Council for the Voluntary Carbon Market (Integrity Council or ICVCM) may adopt further procedures, terms of reference documents and guidance to support implementation of this Assessment Procedure and may revise or update this Assessment Procedure from time to time.
- 1.3 The Integrity Council's governance structure and operational functions¹ that are relevant to this Assessment Procedure are set out below:
 - (a) 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. Governing Board committees comprising independent members of the Governing Board make recommendations to the full Governing Board and the Governing Board may delegate decisions within an agreed scope of delegation to such committees;
 - (b) The Expert Panel makes recommendations to the Governing Board on various topics, including development and application of the CCPs and Assessment Framework and areas of continuous improvement, as well as carrying out other tasks as set out in this Assessment Procedure under the oversight of the Governing Board;

¹ As set out in the Integrity Council's [Modalities & Procedures](#).

Note that in this Assessment Procedure the term Integrity Council may be used to indicate the Secretariat together with (a) the Expert Panel and/or its members and (b) any relevant committee of the Governing Board delegated to have assessment functions, each undertaking functions in accordance with the functions assigned to them in the Modalities & Procedures. References to the Governing Board include a reference to the committee that has the relevant delegated functions.

- (c) The Executive Secretariat (Secretariat) provides operational support to the Governing Board (including its committees), to the Expert Panel and to any multi-stakeholder working groups and work programs, for example for standard-setting, assessment, assurance, oversight, market formation, communications and governance activity;
- (d) Multi-stakeholder groups including external experts provide input and advice to the Integrity Council, including its Governing Board and relevant committees.

Overview of Assessment

- 1.4 Assessment to enable identification of CCP-Approved carbon credits is achieved by the following steps:
 - (a) **Assessment of carbon-crediting programs (“Program-level assessment”):** The Integrity Council assesses whether applicant carbon-crediting programs satisfy the relevant CCPs using the the Assessment Framework. Carbon credits will only be deemed CCP-Approved if they are issued by a carbon-crediting program that has been assessed to fulfil these principles and criteria and requirements. See section 2 of this Assessment Procedure;
 - (b) **Assessment of Categories of carbon credits (“Category assessment”):** The Integrity Council assesses which Categories meet the relevant CCPs using the criteria and requirements applicable to Categories in the Assessment Framework. Carbon credits will only be deemed CCP-Approved if they belong to a Category that has been assessed under this Assessment Procedure to fulfil these principles and criteria and requirements. See section 3 of this Assessment Procedure;
 - (c) **Identification of CCP-Approved carbon credits:** Following the completion of the previous two steps, CCP-Eligible programs will identify which carbon credits are CCP-Approved and tag them as such in its program registry together with any relevant CCP Attributes. The identification and tagging by carbon-crediting programs will be overseen by the Integrity Council. See section 4 of this Assessment Procedure.
- 1.5 Assessment of an applicant carbon-crediting program will tend to precede assessment of Categories, but the Integrity Council may at times choose to assess certain Categories before assessment of the applicant carbon-crediting program has been completed, in which case assessment of Categories in relation to that applicant carbon-crediting program will remain pending until completion of the Program-level assessment and will be finalised only if and when the applicant carbon-crediting program is decided to be CCP-Eligible (including CCP-Eligible conditional on remedial action being completed).

Confidentiality during the assessment process

- 1.6 All information received from applicant carbon-crediting programs per sections 2 and 3 of this Assessment Procedure will be used for the purpose of assessing the carbon-crediting program and Categories against the Assessment Framework and related processes under this Assessment Procedure. The Application will be made public on the ICVCM website² following its submission. Further provisions relating to confidentiality are set out in the Terms and Conditions.

² <https://icvcm.org/>

Stakeholder input

- 1.7 In line with its Governing Principles and Mandate³ including Inclusion, Transparency and Continual Improvement, the Integrity Council encourages feedback from any stakeholders.
- 1.8 Stakeholders may provide input at any time (info@icvcm.org), including in relation to specific Applications or Category assessments. Input will be acknowledged within five working days. Stakeholder input will be made public on the ICVCM website, unless it is offensive, irrelevant or presents other material risk to the Integrity Council process, in which case the fact of the submission, but not the contents, will be listed on the ICVCM website.

Feedback

- 1.9 Feedback on the Integrity Council's work is welcome at any time and may be submitted to info@icvcm.org, including the word "feedback" in the subject line of the email. Feedback will be acknowledged within five working days.

³ [Key Governing Principles and Mandate](#)

2 ASSESSMENT OF CARBON-CREDITING PROGRAMS

-
- 2.1 This section sets out the procedure by which the Integrity Council assesses carbon-crediting programs against the CCPs and the criteria and requirements in the Assessment Framework (Program-level) in order to take a decision to approve or not approve the carbon-crediting program as CCP-Eligible.

Application by a carbon-crediting program to the Integrity Council

- 2.2 Any carbon-crediting program that issues carbon credits may apply to the Integrity Council for assessment of its program.
- 2.3 Any carbon-crediting program that wishes to be assessed should notify the Integrity Council of its intention to apply by sending an email to applications@icvcm.org. The Secretariat will endeavour to provide the carbon-crediting program with login instructions for the Assessment Platform no later than ten working days following the notification.
- 2.4 To apply, the carbon-crediting program must submit the detailed application with appropriate supporting information, documentation and evidence (Application), through the Assessment Platform.
- 2.5 As part of the Application, the carbon-crediting program must reply to all the questions and submit all necessary documents required in the Assessment Platform and must agree to the Terms and Conditions, through the Assessment Platform. The carbon-crediting program may withdraw its program Application at any time before a final decision has been taken by the ICVCM on the approval pursuant to 2.22 below, by emailing applications@icvcm.org. A withdrawn Application means that the Application and Category assessments being undertaken in accordance with section 3 of this Assessment Procedure will not be further processed, and the carbon-crediting program's withdrawal will be made public on the ICVCM website.
- 2.6 Following submission of the Application, the Secretariat will provide the carbon-crediting program with an estimate of the expected timeframe for the assessment, based on its current workload.

- 2.7 In accordance with the Assessment Framework, for CORSIA-eligible carbon-crediting programs, certain sections of the Assessment Framework refer to CORSIA eligibility and requirements. The ICVCM Application under this Assessment Procedure is completed by reference to that CORSIA eligibility and documents supplied in the application submitted to CORSIA.
- 2.8 A carbon-crediting program that has not applied for CORSIA must complete all sections of the ICVCM Application by providing the information, documents and evidence that would be required under CORSIA and as indicated in the Assessment Platform.
- 2.9 A carbon-crediting program that has applied to CORSIA but has not achieved CORSIA eligibility must contact the Secretariat before applying under this Assessment Procedure (applications@icvcm.org).
- 2.10 Following its completion by a carbon-crediting program, the Application will be made public, on the ICVCM website, subject to any redactions agreed between the Integrity Council and the carbon-crediting program where there is a compelling rationale for confidentiality.
- 2.11 The Integrity Council's carbon-crediting program assessment will be treated as confidential during the assessment. The Integrity Council will publish Decisions of the Governing Board relating to carbon-crediting program applications, including reasons for the Decision as set out in this section.

Processing Applications

- 2.12 The Integrity Council will aim to present an assessment Decision for consideration by the Governing Board within four calendar months of receipt of the completed Application (two months if CORSIA-eligible), subject to workload. The expected timeline is subject to change. The Secretariat will notify the applicant carbon-crediting program as soon as practicable if the assessment is expected to take longer, including due to requests to provide further information, or remedial actions.
- 2.13 On receipt of an Application submitted through the Assessment Platform, the Integrity Council will perform an initial completeness review of documentation submitted. The Secretariat will notify the carbon-crediting program of any apparent gaps in information, documentation or evidence submitted through the Assessment Platform, which must be resolved by the carbon-crediting program in order for the assessment to proceed. Where the Application is complete, the Secretariat will notify the carbon-crediting program that the Application is complete and that the Application will proceed to the assessment stage.
- 2.14 Complete Applications will be processed in the order in which they are confirmed as complete.

Application assessment

- 2.15 The Integrity Council will process the Application and prepare a draft Assessment Report, on the basis of the Application submitted by the carbon-crediting program and, where applicable, other relevant public documentation and stakeholder comments submitted per 1.7-1.8 above, if any, identified by the Integrity Council as relevant to the Application.
- 2.16 The Integrity Council will communicate with the carbon-crediting program to resolve any issues identified during the assessment and preparation of the draft Assessment Report. The carbon-crediting program may submit additional information, documentation or evidence in order to resolve such issues.
- 2.17 Where the Integrity Council identifies issues that require changes to the carbon-crediting program's program documents, or other carbon-crediting program processes in order to meet the CCPs and the criteria and requirements of the Assessment Framework, the Secretariat will notify the carbon-crediting program of the required changes. These may be classified as minor changes, such that approval is not subject to completion of those changes, or may require remedial actions that must be resolved before the carbon-crediting program can be approved. Any required minor changes and/or remedial actions will be included in the draft Assessment Report.
- 2.18 The draft Assessment Report will include, as a minimum, summary information about the Program, its Application, any remedial actions, and recommendations from any relevant committee and from the Expert Panel. The Integrity Council shall provide the draft Assessment Report to the relevant carbon-crediting program and the carbon-crediting program may submit information to explain how its program documents or other documents address the issue underlying any remedial action. The Integrity Council may revise the draft Assessment Report on the basis of that information.
- 2.19 The draft Assessment Report and a recommendation for the Decision for one of (a) to (c) in 2.20 below, will be submitted to the Governing Board.
- 2.20 The Governing Board shall consider the draft Assessment Report and the recommendation for the Decision and whether to take a Decision to:
- (a) Approve the carbon-crediting program as CCP-Eligible; or
 - (b) Approve the carbon-crediting program as CCP-Eligible conditional on completion of remedial actions; or
 - (c) Reject the application of the carbon-crediting program.
- 2.21 Where the Governing Board considers it is likely to take a 2.20 (b) or (c) Decision, the Integrity Council shall provide a copy of the final Assessment Report and draft Decision to the carbon-crediting program for its review and comments prior to any Decision per 2.22. The carbon-crediting program may request a hearing, in accordance with section 6 of this Assessment Procedure. After the hearing, if held, the Governing Board shall take a Decision per 2.22 that also takes into account written and oral information from the hearing.
- 2.22 The Governing Board shall consider the final Assessment Report and recommendation for the Decision and take one of the Decisions set out in 2.20 above.

Notification and publication

- 2.23 The Integrity Council will publish the Decision on the ICVCM Website.
- 2.24 Where the Decision is a 2.20 (b) decision, the Approval is conditional upon the remedial actions being completed to the satisfaction of the Integrity Council, based on information submitted by the carbon-crediting program. Until the completion of the remedial actions to the satisfaction of the Integrity Council, the CCP-Eligible program may not tag any carbon credits as CCP-Approved or with CCP Attributes per section 4 below.
- 2.25 A carbon-crediting program that has been rejected per a Decision under 2.20 (c) may resubmit an Application no earlier than six months from the date of that Decision.

CCP-Eligibility of the Program

- 2.26 Subject to suspension or termination of eligibility pursuant to section 5 of this Assessment Procedure, an approved carbon-crediting program is CCP-Eligible from the date of the CCP-Eligibility Decision until such time as a new or revised version of the Assessment Framework has been published, the new or updated application by the carbon-crediting program has been processed and a Decision made in accordance with the Assessment Procedure (including any update or revision thereof).
- 2.27 A CCP-Eligible program may be subject to Interim Review of its CCP-Eligibility in accordance with the provisions on Interim Review contained in section 5 below.

3 ASSESSMENT OF CATEGORIES

- 3.1 In order to enable CCP-Eligible programs to tag carbon credits as CCP-Approved, the Integrity Council will undertake an assessment of Categories⁴ against the criteria and requirements relating to Categories set out in the Assessment Framework. This section describes that assessment process and how a Decision that a Category is/Categories are CCP-Approved is taken by the Integrity Council. This section may be revised and supplemented with further provisions from time to time based on experience of the Integrity Council.

Grouping of Categories for assessment

- 3.2 The Integrity Council will convene a multi-stakeholder Categories Working Group (CWG) to assess Categories that will operate pursuant to terms of reference that will be made public on the ICVCM website.⁵
- 3.3 The CWG will be tasked to review Categories, based on, *inter alia*, public classifications of Categories⁶, publicly available academic literature⁷, information from relevant carbon-crediting programs, ratings agencies, and other public information relating to Categories. The CWG will take into consideration any decisions that impose restrictions and/or changes in scope or applicability of relevant Categories that have been taken by carbon-crediting programs.
- 3.4 Based on the information listed in 3.3, the CWG will prepare an initial analysis of whether Categories appear to meet the criteria and requirements in the Assessment Framework. The initial analysis of the CWG will result in Categories being provisionally grouped for assessment into one of the following groups:
- (a) Fast track consideration;
 - (b) Deeper assessment;
 - (c) Very unlikely to meet the criteria and requirements of the Assessment Framework.

⁴ Assessment will be of categories of credits under active methodologies unless otherwise requested by a carbon-crediting program

⁵ The Terms of Reference will be made public in due course.

⁶ For example, the [Berkeley Voluntary Registry Offsets Database](#)

⁷ In relation to additionality requirements, literature may be used to support an assessment that the Category is additional in the event that the relevant carbon-crediting program documents do not meet all of the relevant criteria and requirements.

- 3.5 The CWG’s initial analysis will be reviewed by the Integrity Council and recommendations on the grouping of the Categories for the assessment will be made to the Governing Board. The recommendation shall include the initial analysis and may, but is not required to, include policy considerations in respect of any one or more Categories. The Governing Board will take a Decision in relation to the groupings for assessment in accordance with 3.4 above. The Decision will be made public on the ICVCM website, along with relevant information.
- 3.6 A CCP-Eligible program, or a carbon-crediting program that has notified the Integrity Council of its intention to apply to be assessed pursuant to section 2 of this Assessment Procedure may, at any time, exclude one or more of its methodologies from further assessment under this Assessment Procedure, via the Assessment Platform or by emailing the Secretariat (applications@icvcm.org). In relation to methodologies that are excluded by the carbon-crediting program, the Secretariat will maintain a public list on the [ICVCM website](#) of excluded methodologies or versions thereof per applicant or CCP-Eligible program.

Assessment of Categories

- 3.7 For Categories grouped per “(a) Fast track consideration,” the Integrity Council will make a recommendation for a Decision to the Governing Board pursuant to 3.13 (a) below.
- 3.8 For Categories grouped per “(b) Deeper assessment,” the Integrity Council will appoint and convene Multi-Stakeholder Working Groups (MSWGs), that will operate pursuant to terms of reference that will be made public on the ICVCM website.⁸
- 3.9 The assessment of Categories in group “(b) Deeper assessment,” will be sequenced based on current market share and market trends and the Secretariat will publish an indicative sequencing of assessments.
- 3.10 The MSWGs will be tasked to assess specific Categories, including their underlying methodologies, based on, *inter alia*, public classifications of Categories,⁹ publicly available academic literature¹⁰, information from ratings agencies, carbon-crediting program specific information including information submitted as part of its Application, and other public information relating to Categories. The MSWGs will take into consideration any decisions that impose restrictions and/or changes in the scope or applicability of relevant Categories that have been taken by carbon-crediting programs.
- 3.11 Based on the information listed in 3.10, MSWGs, with the support of the Integrity Council, will prepare assessments of whether the relevant Category/Categories meet(s) the criteria and requirements in the Assessment Framework. The MSWGs may make one of the following assessments and may, but is not required to, include policy considerations in addition to its assessment.
- (a) The Category/Categories meet(s) the criteria and requirements for CCP-approval;
 - (b) The Category/Categories meet(s) the criteria and requirements for CCP-approval if the relevant carbon-crediting program(s) take(s) remedial action;
 - (c) The Category/Categories does not/do not meet the criteria and requirements for CCP-approval.

⁸ The Terms of Reference will be made public in due course.

⁹ For example, the [Berkeley Voluntary Registry Offsets Database](#).

¹⁰ See footnote 7 above.

- 3.12 Each MSWG assessment and policy considerations, if any, will be reviewed by the Integrity Council and the Integrity Council will prepare a draft Evaluation Report on the basis of the MSWG assessment and any policy considerations, if any. The Integrity Council may, but is not required to, include further policy considerations. The Integrity Council shall provide the draft Evaluation Report to the relevant carbon-crediting program. Where the assessment is a 3.11 (b) or (c) assessment, the carbon-crediting program may submit information to explain how its program documents or other documents address issues underlying the assessment. The Integrity Council may revise the draft Evaluation Report on the basis of that information. The draft Evaluation Report and a recommendation for the Decision for one of 3.13 (a) to (c) below, will be submitted to the Governing Board.
- 3.13 The Governing Board shall consider the draft Evaluation Report and the recommendation for a Decision and other relevant information, if any, and whether to take a Decision that:
- (a) The Category/Categories meet(s) the criteria and requirements for CCP-approval;
 - (b) The Category/Categories meet(s) the criteria and requirements for CCP-approval if the relevant program takes remedial action;
 - (c) The Category/Categories does not/do not meet the criteria and requirements for CCP-approval.
- 3.14 Where the Governing Board considers it is likely to take a 3.13 (b) Decision the Integrity Council shall provide a copy of the final Evaluation Report and draft Decision including the remedial action to the carbon-crediting program prior to any Decision per 3.16. The carbon-crediting program may request a hearing, in accordance with section 6 of this Assessment Procedure. After the hearing, if held, the Governing Board shall take a Decision on the Category/Categories per 3.16 below that also takes into account written and oral information from the hearing.
- 3.15 Where the Governing Board considers it is likely to take a 3.13 (c) Decision, the Integrity Council shall provide a copy of the final Evaluation Report and draft Decision to the carbon-crediting program prior to any Decision per 3.16. The carbon-crediting program may request a hearing, in accordance with section 6 of this Assessment Procedure. After the hearing, if held, the Governing Board shall take a decision on the Category/Categories per 3.16 below that also takes into account written and oral information from the hearing.
- 3.16 The Governing Board shall consider the final Evaluation Report and recommendation for the Decision and take one of the Decisions set out in 3.13 above.
- 3.17 Where the Governing Board takes a 3.13 (a) Decision, the Decision will be made publicly available on the ICVCM website in accordance with 3.22 below.
- 3.18 Where the Governing Board takes a 3.13 (c) Decision, the Integrity Council will immediately notify the Decision to the relevant carbon-crediting program and will make the Decision public on the ICVCM website.
- 3.19 Where the Governing Board takes a 3.13 (b) Decision, the Secretariat will immediately notify the Decision to the relevant carbon-crediting program and will make the Decision public on the ICVCM website. The Decision shall specify the remedial action to be taken by the carbon-crediting program.

- 3.20 Where the Decision is a 3.13 (b) Decision, the CCP-Approval of the Category is conditional upon the remedial action being completed to the satisfaction of the Integrity Council, based on information submitted by the carbon-crediting program. Until the completion of the remedial action to the satisfaction of the Integrity Council, the CCP-Eligible program may not tag any carbon credits in the relevant Category as CCP-Approved or with CCP Attributes per section 4 below. Completion of remedial action shall be determined by a subsequent Decision of the Governing Board, which will be made publicly available on the ICVCM website in accordance with 3.22 below.
- 3.21 For Categories grouped per 3.5 based on options in 3.4 as “(c) Very unlikely to meet the criteria and requirements of the Assessment Framework,” upon the completion of the assessment for Categories grouped (a) and (b), the Integrity Council will prepare a draft Evaluation Report and a recommendation for a Decision to the Governing Board to be taken pursuant per 3.16 above. Where the Decision is not a 3.13 (c) Decision, the Governing Board shall provide further detailed reasoning in the Decision.

Timing of Publication of Decisions granting CCP-Approval

- 3.22 The Integrity Council may coordinate the timing of publication of Decisions awarding CCP-Approval to Categories with the relevant carbon-crediting program(s) to enable the carbon-crediting program to identify and prepare to tag relevant CCP-Approved carbon credits.

CCP Attributes

- 3.23 A CCP-Eligible program may tag CCP-Approved carbon credits with relevant CCP Attributes where the criteria and requirements in relation to CCP Attributes as set out in the Assessment Framework have been met.

CCP-Approval

- 3.24 A carbon credit that has been tagged as CCP-Approved shall retain the CCP-Approved tag until it is retired or cancelled.
- 3.25 Subject to termination or suspension of the CCP-Eligible program and/or the CCP-Approval of the Category per section 5 of this Assessment Procedure, the CCP-Approval of the Category applies to all issued carbon credits included within the Category at the date of the CCP-Approval Decision. The CCP-Approval also applies to all carbon credits in the Category that are issued by the CCP-Eligible program after the date of the CCP-Approval Decision.
- 3.26 Where a CCP-Eligible program includes a new Category within its scope (for example, due to a new version of a methodology, a new methodology, or a new approach to address non-permanence risks) or wishes to seek the approval of a Category that was previously withdrawn per 3.6 above, it may request assessment of that Category in order for it to be included as a CCP-Approved Category in accordance with this section 3 and further procedures that may be developed by the Integrity Council.

4 APPLYING ASSESSMENT DECISIONS

Tagging of carbon credits as CCP-Eligible

- 4.1 A CCP-Eligible program may tag carbon credits as CCP-Approved where all of the following conditions are met:
 - (a) The issuing carbon-crediting program has been determined by the Integrity Council to be CCP-Eligible pursuant to section 2 of this Assessment Procedure;
 - (b) The carbon credit belongs to a Category that has been determined by the Integrity Council to be CCP-Approved pursuant to section 3 of this Assessment Procedure.
- 4.2 Each CCP-Eligible program will work with its registry to identify the carbon credits to be tagged as CCP-Approved and that may be tagged with relevant CCP Attributes. The carbon-crediting program shall document in writing the process and information used to identify which carbon credits are to be tagged as CCP-Approved and with relevant CCP Attributes.
- 4.3 The carbon-crediting program shall be responsible for the accuracy of tagging of CCP-Approved carbon credits in the program registry and for the accuracy of tagging of CCP Attributes.

Integrity Council Assurance of Accuracy

- 4.4 The Integrity Council will be responsible for assurance over the tagging of CCP-Approved carbon credits by CCP-Eligible programs, including the tagging of CCP Attributes.
- 4.5 The Integrity Council will seek to achieve high confidence that carbon credits are tagged accurately and may place reliance on information in the relevant carbon-crediting program registry concerning the carbon credits.
- 4.6 Assurance may include the following steps:
 - (a) Review with the carbon-crediting program of the CCP-Approved carbon credit identification process;
 - (b) Audit by the Integrity Council and/or the CCP-Eligible program of the identification process and information used;

- (c) Positive confirmation through sampling of CCP-Approved tagged carbon credits in the program registry, to confirm the tagged carbon credits match the Categories specified in the relevant Decision. CCP Attributes may also be sampled;
 - (d) Negative confirmation through data analysis of the set of CCP-Approved tagged carbon credits to ensure that carbon credits that do not match the Categories and conditions specified in the Decision in various respects are not tagged.
- 4.7 In the event that any incorrect tagging is identified, the CCP-Eligible program will be required to correct the incorrect tagging within five working days and to notify the Integrity Council when the correction is completed. The Integrity Council may extend its sample and/or perform follow-up assurance as it deems appropriate to ensure that incorrect tagging has been resolved.
- 4.8 Assurance processes may lead to investigations and/or Interim Review processes as described in section 5 below.
- 4.9 The Secretariat will prepare a periodic assurance report for consideration by the Governing Board.

5 ONGOING ASSURANCE AND ENFORCEMENT

Ongoing Assurance

- 5.1 The aim of the Integrity Council's ongoing oversight and assurance is:
- (a) To promote transparency, which encourages greater scrutiny of mitigation activities and carbon-crediting programs;
 - (b) To ensure CCP-Eligible programs are complying with the CCPs and Assessment Framework;
 - (c) To be alert to thematic issues (real or perceived) that warrant follow up or lessons to be shared, to ensure high integrity is maintained.

Responsibility of Programs

- 5.2 A CCP-Eligible program shall adhere to the governance, program documents and practices as set out in its Application and to enforce the requirements of the methodologies, tools, standards and other documents that have formed the basis for approval as CCP-Approval in relation to Categories.
- 5.3 A CCP-Eligible program shall comply with the criteria and requirements set out in the Assessment Framework.
- 5.4 A CCP-Eligible program shall ensure it has procedures for handling questions and complaints from mitigation activity proponents and third parties, including stakeholders, about its tagging of CCP-Approved carbon credits and other aspects of its compliance with the ICVCM Assessment Framework. The procedures shall be notified to the Integrity Council. The Integrity Council may redirect stakeholder complaints received under section 6 below to the relevant CCP-Eligible program, if appropriate.
- 5.5 A CCP-Eligible program should notify the Integrity Council as soon as possible (subject to any legal restrictions) where:
- (a) It anticipates, or has implemented, a material change in its governance, program documents and practices that formed part of its Application, such as a merger or transfer of decision-making powers, in respect of the CCP-Eligible program or of a CCP-Approved Category, including changes related to documents and tools. A material

change is one that could reasonably be expected to affect the Integrity Council's approval Decision for a carbon-crediting program or eligibility Decision for a Category;

- (b) A material failure to comply with the criteria and requirements set out in the Assessment Framework has or is likely to have occurred.

5.6 The Integrity Council may undertake an Interim Review of a CCP-Eligible program or CCP-Approved Category as a result of a notification pursuant to 5.5.

5.7 A CCP-Eligible program shall provide an annual report to the ICVCM containing information on the application of the Assessment Framework and CCP-Approval during the relevant year, including CCP-Approved tagging, complaints and revisions and updates to documents relevant to the CCP-Eligible status of the program, based on a template to be developed by the Integrity Council.

Performance monitoring by the Integrity Council

5.8 The Integrity Council will, at its discretion, monitor the performance of CCP-Eligible programs and CCP-Approved Categories. Monitoring will be risk-based and through actions that may include:

- (a) Review of data and market intelligence;
- (b) Reviewing issues and themes that arise through the CCP-Eligible program's own oversight and complaints process (as reported per section 5.7 above);
- (c) Spot-checks and sample-based auditing;
- (d) Monitoring complaints and issues arising in the VCM;
- (e) Thematic analysis of any trends and patterns emerging from the above actions;
- (f) Ongoing consultation and input through ICVCM work programs;
- (g) Inviting input from stakeholders on areas for possible improvement.

Investigations

5.9 Where the Integrity Council considers, in its sole discretion, an investigation is necessary to resolve identified issues:

- (a) It may inform the CCP-Eligible program, and the CCP-Eligible program shall work in good faith to resolve identified issues with the Integrity Council;
- (b) Necessary investigation will be led by the CCP-Eligible program, but the Integrity Council reserves the right to investigate if required;
- (c) 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 and the CCP-Eligible program will seek to address those issues and accommodate spot-checks;
- (d) The Integrity Council will consider adequacy and effectiveness of resolution and improvement actions arising from investigations.

5.10 The Integrity Council may initiate an assessment based on available information at its own discretion at any time where it suspects misuse of the Integrity Council brand, CCP trademark or risk of market confusion, such as where an organisation has not been assessed as CCP-Eligible by the Integrity Council but has made claims in relation to the CCP, such as a claim to be CCP compliant.

Interim Review

5.11 The Integrity Council may initiate an Interim Review of the CCP-Eligible program or of a CCP-Approved Category, at its sole discretion, if it becomes aware of a material change or if it has cause to suspect material failings, including but not limited to:

- (a) Material, or repeated instances of non-compliance with the CCPs and Assessment Framework criteria and requirements;
- (b) In relation to a carbon-crediting program CCP-Eligibility Decision, failure to implement minor changes or complete remedial actions;
- (c) Non-disclosure by the carbon-crediting program of a material change, as required by 5.4;
- (d) Changes in the CORSIA application requirements, Emission Unit Eligibility Criteria and/or other changes in CORSIA that have implications for the ICVCM;
- (e) For a CORSIA-Eligible program, the lapsing or revocation of CORSIA eligibility;
- (f) An apparent non-adherence by the CCP-Eligible program to its governance and practices as set out in its Application where the non-adherence may reasonably be expected to lead to a material breach of the CCPs and Assessment Framework;
- (g) Material failure to cooperate with the Integrity Council's investigations and/or to respond to reasonable requests made in accordance with published processes;
- (h) Failure to rectify material issues or errors that have been identified during any investigation;
- (i) Fraud or gross negligence, false disclosure to the Integrity Council, publishing or allowing misleading information to be released.

5.12 Where, in accordance with 5.11, the Integrity Council considers initiating an Interim Review:

- (a) The Integrity Council will analyse the case and prepare a proposal on the scope and modalities of any Interim Review required, for example re-performing a section(s) of the Assessment Procedure and provide a recommendation to the Governing Board;
- (b) The Governing Board will make a Decision on initiating an Interim Review;
- (c) Where the Governing Board decides to initiate an Interim Review, the Integrity Council will communicate with the CCP-Eligible program as appropriate to gather information, clarify issues or agree upon remediation actions;
- (d) The Integrity Council will prepare a report including its findings, required remedial actions, if any, and make a recommendation for a draft Decision for one of 5.13 (a) to (c).

- 5.13 The Governing Board will review the report and consider whether to take a Decision to:
- (a) Close the Interim Review due to resolution of the identified issues, including any agreed remediation plan;
 - (b) Suspend the CCP-Eligibility of the carbon-crediting program or the CCP-Approval of the Categories, as applicable, in accordance with this section 5;
 - (c) Terminate the CCP-Eligibility of the carbon-crediting program or the CCP-Approval of the Categories, as applicable in accordance with this section 5.
- 5.14 Where the Governing Board considers it is likely to make a 5.13 (a) recommendation, the draft Decision shall be provided to the CCP-Eligible program. The Governing Board shall adopt a Decision to close the Interim Review due to resolution of the identified issues. The fact of the Interim Review and its closure, but not the Decision, shall be made public on the ICVCM website.
- 5.15 Where the Governing Board considers it likely to take a 5.13 (b) or (c) decision, the draft Decision will be provided to the CCP-Eligible program in accordance with the provisions below, as applicable. The CCP-Eligible program may request a hearing in accordance with section 6 of this Assessment Procedure. The Decision of the Governing Board shall take into account written or oral information provided in the hearing.

Suspension of CCP-Eligibility or CCP-Approval

- 5.16 The Integrity Council reserves the right to suspend the eligibility of a CCP-Eligible program or approval of CCP-Approved Categories following an Interim Review completed in accordance with this section 5, where, in the view of the Governing Board, such suspension is necessary and proportionate in order to protect the functioning of the VCM and reputation of the Integrity Council.
- 5.17 Where the Governing Board has determined pursuant to the Interim Review that suspension is appropriate:
- (a) The Integrity Council will provide the CCP-Eligible program with the draft Suspension Decision. The draft Suspension Decision shall as a minimum contain: the grounds for the suspension, sufficient information for the carbon-crediting program to understand how the Integrity Council came to the view that suspension was necessary and proportionate, and the conditions to be satisfied by the carbon-crediting program for the program or Categories to be reinstated;
 - (b) The carbon-crediting program will have a response period of eight weeks to provide a rebuttal and/or undertake remediation and provide evidence of such remediation to the Integrity Council. In exceptional circumstances, the Integrity Council may, due to the seriousness and/or urgency of the issue, provide a shorter response period to the carbon-crediting program, of not less than five working days;
 - (c) The carbon-crediting program will have the right to a hearing in front of the Governing Board in accordance with section 6 below, prior to any Decision. The Decision of the Governing Board shall take into account written or oral information provided in the hearing;

- (d) The Governing Board shall review and may revise the draft Suspension Decision based on the hearing, if any, or rebuttal and/or remediation by the program, including determining that suspension is no longer required, in which case it shall not suspend the CCP-Eligibility of the carbon-crediting program/the CCP-Approval of the Category, as applicable.
- 5.18 The Governing Board shall consider the revised draft Suspension Decision pursuant to section 5.14 and shall take a Decision to:
- (a) Not suspend the carbon-crediting program;
 - (b) Suspend the carbon-crediting program, in which case the Suspension Decision shall as a minimum contain: the grounds for the suspension, sufficient information for the carbon-crediting program to understand how the Integrity Council came to the view that suspension was necessary and proportionate, and the conditions to be satisfied by the program for the carbon-crediting program or Categories to be reinstated. The Suspension Decision shall have immediate effect.
- 5.19 The Suspension Decision shall be notified immediately to the carbon-crediting program. Within two working days of a Suspension Decision being notified pursuant to section 6 of this Assessment Procedure, a non-confidential version of the Decision will be made public on the ICVCM website.
- 5.20 During a period of suspension of the CCP-Eligibility of a carbon-crediting program, the carbon-crediting program is not permitted to tag any carbon credits as CCP-Approved or tag any carbon credits with CCP Attributes or identify any new mitigation activities as CCP-Approved.
- 5.21 During a period of suspension of the CCP-Approval of a Category, the carbon-crediting program is not permitted to tag any carbon credits of that Category as CCP-Approved or tag any carbon credits of that Category with CCP Attributes or identify any new mitigation activities of that Category as CCP-Approved.
- 5.22 As soon as the carbon-crediting program has fulfilled, to the satisfaction of the Integrity Council, the relevant condition(s) for lifting the suspension as set out in the Suspension Decision, the Integrity Council shall prepare a draft Reinstatement Decision containing sufficient information on how the carbon-crediting program has resolved the issues that were the grounds for suspension and how it has met the conditions for reinstatement, for consideration by the Governing Board.
- 5.23 The draft Reinstatement Decision shall be provided to the carbon-crediting program. The carbon-crediting program shall have two working days to comment on the draft Reinstatement Decision. The Integrity Council shall review the comments and may revise the draft Reinstatement Decision.
- 5.24 The Governing Board shall consider the draft Reinstatement Decision and the recommendation and shall, unless otherwise decided by the Governing Board, adopt the Reinstatement Decision. The Reinstatement Decision shall have immediate effect and shall be made public on the ICVCM website.
- 5.25 Upon publication of the Reinstatement Decision, the carbon-crediting program may tag carbon credits issued during a suspension period as CCP-Approved and CCP Attributes and may identify any new mitigation activities as CCP-Approved, if applicable.

5.26 Where the carbon-crediting program does not fulfil, to the satisfaction of the Integrity Council, the relevant condition(s) for lifting the suspension as set out in the Suspension Decision, including any conditions relating to timeframes, the Governing Board may consider whether the Interim Review and the suspension process are sufficient for the Governing Board to consider termination, in which case, the provisions relating to termination in this section shall apply.

Termination of CCP-Eligibility or CCP-Approval

5.27 The Integrity Council reserves the right to terminate the CCP-Eligibility of a carbon-crediting program or CCP-Approval of a Category. Circumstances under which CCP-Eligibility or CCP- Approval designation may be terminated include but are not limited to the most severe examples of the circumstances listed in 5.11 above, that raise material doubt as to the carbon-crediting program's competence, conduct and/or commitment to meeting the criteria and requirements of the CCPs and the Assessment Framework, overall or in respect of the Categories in question, in the opinion of the Governing Board.

5.28 Termination Decisions may be taken by the Governing Board only after an Interim Review, and after any related Suspension Decision, as set out in this section 5.

5.29 Where the Governing Board has determined pursuant to the Interim Review that termination is appropriate:

- (a) The Integrity Council will provide the carbon-crediting program with the draft Termination Decision. The draft Termination Decision shall as a minimum contain: the grounds for the termination, and sufficient information for the carbon-crediting program to understand how the Integrity Council came to the view that termination was necessary and proportionate;
- (b) The carbon-crediting program will have a response period of eight weeks to provide a rebuttal and/or undertake remediation and provide evidence of such remediation to the Integrity Council. In exceptional circumstances, the Integrity Council may, due to the seriousness of the issue, provide a shorter response period to the carbon-crediting program, of not less than two weeks;
- (c) The carbon-crediting program will have the right to a hearing in front of the Governing Board in accordance with section 6 below prior to any Decision. The Decision of the Governing Board shall take into account written or oral information provided in the hearing.

5.30 The Governing Board shall consider the revised draft Termination Decision pursuant to 5.27 above and shall take a Decision to:

- (a) Not terminate the CCP-Eligibility of the program/the CCP-Approval of the Categories;
- (b) Terminate the CCP-Eligibility of the program/the CCP-Approval of the Categories, in which case the Termination Decision shall as a minimum contain: the grounds for the termination and sufficient information for the carbon-crediting program to understand how the Integrity Council came to the view that suspension was necessary and proportionate. The Termination Decision shall have immediate effect.

5.31 The Decision shall be notified immediately to the carbon-crediting program. Within two working days of a Termination Decision being notified to the carbon-crediting program, a non-confidential version of the Decision will be made public on the ICVCM website.

- 5.32 The termination of CCP-Eligibility of a carbon-crediting program means that, unless otherwise decided by the Governing Board and communicated in the relevant Termination Decision, no further carbon credits may be tagged as CCP-Approved or tagged with CCP Attributes and no new mitigation activities may be identified as CCP-Approved.
- 5.33 Carbon credits tagged prior to the date of the Termination Decision are not affected by the Termination Decision.

Sharing Lessons and Continual Improvement

- 5.34 The Integrity Council will maintain a confidential record of issues with the implementation of the Assessment Framework and the Assessment Procedure that it identifies or that are notified to it.
- 5.35 The Integrity Council will periodically provide a summary report of anonymised and aggregated trends in issues identified for the Governing Board. Where trends are apparent, the Governing Board may request the Integrity Council to consider the trends and provide a recommendation to the Governing Board on implications, if any, for the next update or revision to the Assessment Framework or Assessment Procedure.
- 5.36 The Integrity Council may convene carbon-crediting programs and other stakeholders in order to share experiences of applying the Assessment Procedure and seek feedback on its application.

6 HEARINGS, INDEPENDENT REVIEW, COMPLAINTS

Complaints (programs and stakeholders)

- 6.1 Pursuant to section 1, 1.7 to 1.9, stakeholders may provide input to the ICVCM at any time, in accordance with those provisions.
- 6.2 Carbon-crediting programs and stakeholders that wish to make a complaint relating to the Integrity Council and/or any CCP-Eligible program, may submit such a complaint to complaints@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 after the event giving rise to the complaint. Complainants must provide their contact details (i.e., complaints must not be anonymous) or the complaint will not be considered further.
- 6.3 The Secretariat will aim to acknowledge the complaint within five working days and to investigate and aim to complete the investigation within two months. The Secretariat may, but is not required to, inform the complainant of the outcome of its investigation. If the Secretariat considers the complaint will require a more complex review or investigation with a longer timeframe, including cases involving third parties, the Secretariat will inform the complainant of this.
- 6.4 The Secretariat may forward a stakeholder complaint to a CCP-Eligible program where the complaint relates to processes or documents managed by the CCP-Eligible program and is not a complaint about the CCP-Eligible program’s performance in relation to or compliance with the Assessment Framework or ICVCM and will inform the stakeholder accordingly.
- 6.5 Where the complaint pertains to the governance and operational functions of the Integrity Council, the Secretariat may use external experts to consider the matter and shall inform the complainant.
- 6.6 The Secretariat will maintain a confidential record of complaints.
- 6.7 The Integrity Council will periodically provide a summary report of anonymised and aggregated trends in complaints for the Governing Board. Where trends are apparent, the Governing Board may request the Integrity Council to consider the trends and provide a recommendation to the Governing Board on implications, if any, for the next update or revision to the Assessment Framework or Assessment Procedure.

Hearings (programs)

- 6.8 A carbon-crediting program may request a hearing in relation to any draft Decision addressed to it per sections 2, 3 and 5 that it considers does or may have implications for it. The request shall be made by emailing the Secretariat at info@icvcm.org.
- 6.9 The hearing may be in-person or virtual and will be organised by the Integrity Council and conducted by the Governing Board. Logistics arrangements will be consulted with and then communicated to the carbon-crediting program. The Integrity Council will provide to the carbon-crediting program all relevant information that forms the basis of the draft Decision (including draft Assessment Report or draft Evaluation Report and any draft Decision, as applicable), except where information is subject to confidentiality requirements or other legal restrictions.
- 6.10 The carbon-crediting program may make written submissions for the hearing, including evidence to support the submissions and be represented by persons of its choosing, except that no representative shall have been previously employed by or worked for the Integrity Council in the last two years or served on the Governing Board or the Expert Panel in the last two years. Representatives shall confirm that they have no conflict of interest per the Conflicts of Interest Policy at the start of the hearing.
- 6.11 The hearing will be conducted in English and the carbon-crediting program may present such written or oral information as it considers necessary.
- 6.12 Written submissions prior to and information presented in the hearing shall be taken into account by the relevant committee of independent members of the Governing Board in the finalisation of the draft Decision, as set out in sections 2, 3 and 5 of this Assessment Procedure.

Independent Review (programs)

- 6.13 A carbon-crediting program may request Independent Review by an arbitral panel of any of the following:
- (a) Decisions of the Governing Board;
 - (b) Actions or inactions by the Integrity Council that are alleged to be in the scope of but appear to the carbon-crediting program to be materially inconsistent with the Assessment Procedure or Assessment Framework.
- 6.14 An Independent Review request shall be made by emailing the Secretariat at info@icvcm.org.
- 6.15 The Independent Review is intended as a final arbitration process, as further set out in the Terms and Conditions.



THE INTEGRITY COUNCIL
FOR THE VOLUNTARY CARBON MARKET

ICVCM.ORG