



THE INTEGRITY COUNCIL
FOR THE VOLUNTARY CARBON MARKET

Continuous Improvement Work Program report: Oversight of Validation and Verification Bodies

July 2026, Version 1.0

Acknowledgements

The ICVCM would like to acknowledge the contributions of all the individuals and organisations involved in the development of this report as participants in the CIWP.

Publishing and Copyright Information

The Integrity Council for the Voluntary Carbon Market copyright notice displayed in this document indicates the date on which the document was last issued.

© **The Integrity Council for the Voluntary Carbon Market 2026**

Published by The Integrity Council for the Voluntary Carbon Market July 2026

Disclaimer

This document is based on the knowledge and information available to the ICVCM and the Continuous Improvement Work Program (CIWP) participants during the period of the CIWP. It may contain statements that do not relate strictly to historical or current facts. Such statements may include, without limitation, estimates, commitments, plans, approaches and ambitions.

All views expressed are the collated views of the participants in the CIWP and/or the organisations they represent. Not all participants supported all the views expressed, and any recommendations do not imply consensus or specific support from any or all participants. The views expressed and any recommendations do not represent the views of the ICVCM.

Any information included that is based on financial, economic or other conditions is current as of the date of the CIWP, unless otherwise stated. The ICVCM disclaims any obligation to update, revise or correct any forecast, opinion, expectation or other forward-looking statement to reflect events that occur or circumstances that arise after the date of this document.

This document is provided for information only and does not represent any intention or commitment by the ICVCM to change or maintain any part of its Assessment Framework or any other provisions or documents of the ICVCM.

No representation, warranty or undertaking, express or implied, is or will be made by the ICVCM, its advisers or any other person as to the truth, accuracy, completeness, correctness or fairness of the information or opinions contained in this document, and any reliance you place on them will be at your sole risk. Without prejudice to the foregoing, neither the ICVCM nor any of its affiliates, associates, advisers, directors, employees or representatives accept any liability whatsoever for any loss or damage howsoever arising, directly or indirectly, from the use of, or reliance on, this document or its contents or otherwise arising in connection therewith.

Where websites and webpages have been cited, they are provided for ease of reference and are correct at the time of publication. The location of a webpage or website, or its contents, cannot be guaranteed.

The ICVCM's Continuous Improvement Work Programs

The Integrity Council for the Voluntary Carbon Market's (ICVCM) Continuous Improvement Work Programs (CIWPs) ensure that carbon markets continue to evolve by bringing together leading experts and key stakeholders in a collaborative effort to address complex challenges, provide thought leadership, and chart the next generation of solutions to accelerate high-integrity carbon markets. The CIWPs harness the latest science, emerging technologies, and innovative approaches from across the market to inform the next generation of carbon market integrity systems and standards.

The recommendations of these multi-stakeholder, expert working groups will inform further refinement and development of the ICVCM rulebook, particularly the CCP Assessment Framework. They may also refer to actions more appropriately implemented by entities other than the ICVCM, but which are nonetheless crucial for future market development and maturation.



Contents

6 Executive Summary

Summary	7
Key takeaways	8
Next steps	11

12 Oversight of Validation and Verification Bodies

Introduction	13
Background and scope of work	17
Outcomes and recommendations	21
Participants	34
Annexes	35
Annex 1. Table of recommendations	36
Annex 2. Existing oversight mechanisms of VVBs	41

Executive summary

Summary

Validation and verification bodies (VVBs) play a central role in carbon markets by providing an independent conformity assessment of the design and performance of greenhouse gas (GHG) mitigation activities. Their assessments underpin project registration and credit issuance decisions and are therefore fundamental to the credibility, transparency and integrity of carbon credits. As the market continues to scale and diversify, expectations of validation and verification have expanded, particularly in relation to sustainable development benefits and social and environmental safeguards. These developments have increased the complexity of assurance activities and placed growing pressure on existing arrangements for the oversight of VVBs.

The Core Carbon Principles (CCP) Assessment Framework establishes requirements for robust third-party validation and verification and for the oversight of VVB performance by carbon-crediting programs. However, feedback from market participants, public consultation responses and prior Continuous Improvement Work Programs (CIWPs) indicates that challenges related to VVB performance and oversight persist across the system. These challenges extend beyond the responsibilities of individual carbon-crediting programs and reflect the multi-layered ecosystem within which VVBs operate, involving accreditation bodies, international standards, program-level rules and broader market dynamics. Addressing such issues therefore warranted a dedicated CIWP focused on the oversight of VVBs.

Using the CCP Assessment Framework as a baseline, this CIWP examined a set of interrelated challenge areas identified through preparatory analysis: the role and boundaries of VVB responsibilities; carbon-crediting program approaches to overseeing VVB performance; capacity, competency and staffing constraints; the assessment of sustainable development and safeguards; conflicts of interest and structural incentives; and transparency and accountability in validation and verification outcomes. Together, these areas reflect both technical and governance-related dimensions of assessment quality, with particular emphasis on the growing complexity associated with social and environmental safeguards in addition to core GHG accounting.

The CIWP brought together a diverse group of participants from across the validation and verification ecosystem, including accreditation bodies, VVBs, carbon-crediting programs, project developers, Indigenous Peoples' representatives, human rights specialists, intergovernmental organisations, research organisations and wider market experts. The work program meetings took place online between September 2025 and February 2026 and were organised into five thematic sessions aligned with the identified challenge areas, as well as cross-cutting discussion on digital measurement, reporting and verification (MRV) as it relates to the oversight of VVB performance.

This report synthesises the findings and recommendations from that process, highlighting actions for the ICVCM and other market stakeholders, and identifying next steps for integrating relevant outcomes into the CCP Assessment Framework and related workstreams.

Key takeaways

The CIWP concluded that strengthening oversight of VVBs requires a system-wide approach that recognises the interdependencies between accreditation bodies, carbon-crediting programs and VVBs themselves. While existing international standards and carbon-crediting program-level controls provide important guardrails, inconsistencies in application, capacity constraints and evolving expectations, particularly in relation to safeguards and sustainable development, create risks to assessment quality and market confidence.

The recommendations set out in this report focus on:

- clarifying and harmonising expectations around VVB roles, responsibilities and competencies;
- strengthening carbon-crediting program level oversight, transparency and accountability mechanisms;
- addressing capacity, competency and incentive related challenges affecting VVB performance; and
- improving coordination and information sharing across carbon-crediting programs and accreditation bodies.

These recommendations are mutually reinforcing and are intended to support consistent, credible validation and verification outcomes as the market scales. The full set of recommendations and supporting information is provided in the main report and Annex 1. The order of these recommendations does not imply prioritisation or a ranking of the recommendations presented.

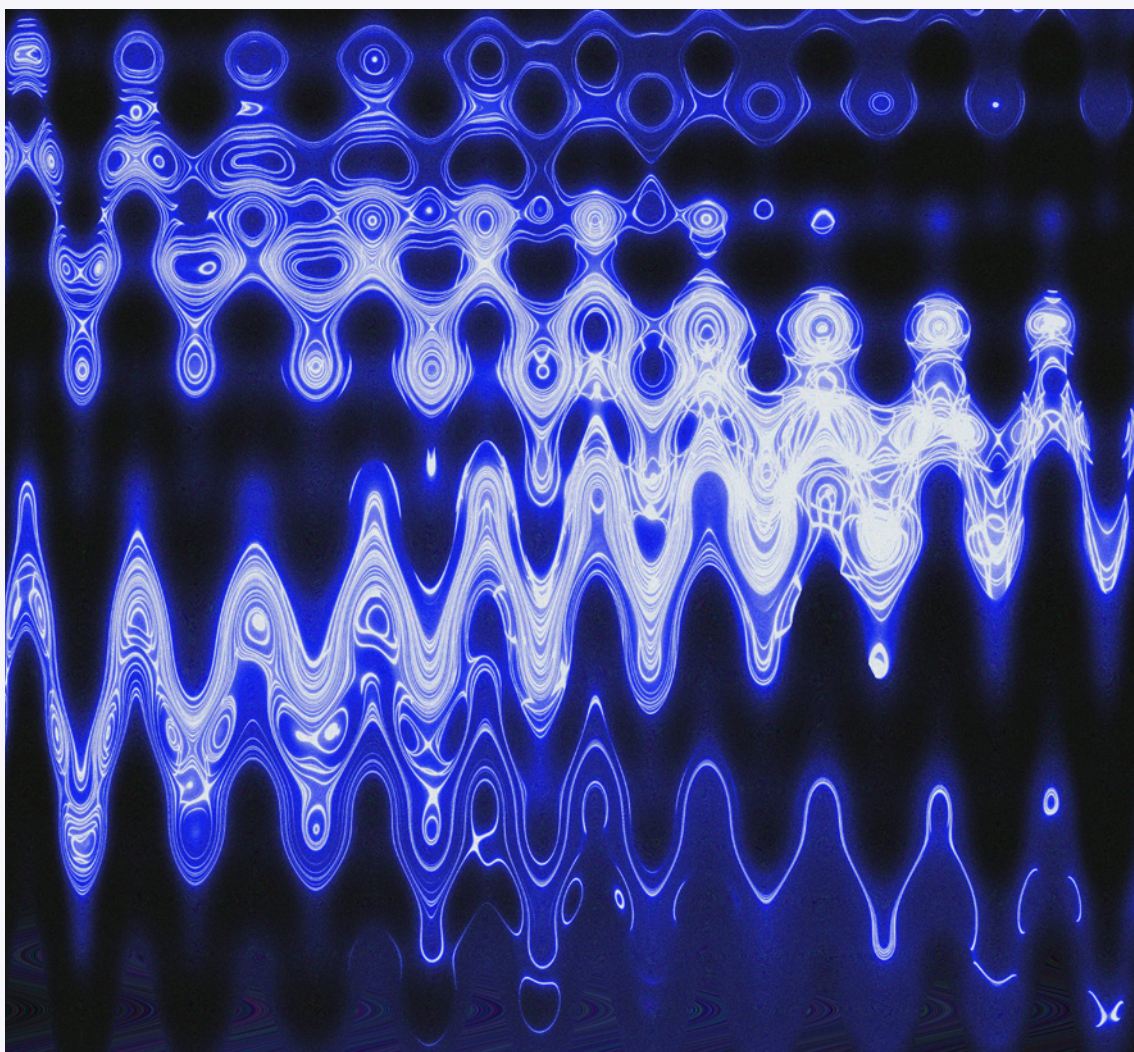
- 1. The ICVCM should establish minimum transparency and reporting requirements for CCP-Eligible programs in relation to VVB performance** to improve comparability of oversight practices and strengthen accountability across the market. Proportionate, standardised reporting on oversight activities and performance trends would support trust and continuous improvement while balancing transparency with confidentiality and avoiding punitive approaches.
- 2. Carbon-crediting programs should establish clear, tiered rectification frameworks for VVB performance**, enabling proportionate responses to issues ranging from minor technical errors to serious, material misstatements. Consistent approaches to corrective actions, accountability and remediation, supported by shared minimum requirements across programs, would strengthen oversight, reinforce incentives for high-quality assessment and help ensure that material issues are identified and addressed transparently and fairly across the market.

3. **The ICVCM should clarify and harmonise expectations around the boundaries of VVB responsibilities**, particularly in relation to due diligence of mitigation activities and legal compliance by project participants (e.g. human rights, anti-money laundering). This includes clearly distinguishing the roles of VVBs, carbon-crediting programs and accreditation bodies and supporting consistent approaches to minimum checks, escalation of concerns and communication of the VVB role across the market.
4. **The ICVCM should clarify expectations for VVBs and carbon-crediting program reviewers to collectively possess and apply multidisciplinary expertise**, including GHG assessment, environmental and social safeguards, SDG impacts and financial considerations for additionality. Strengthened competency requirements would help ensure that validation and verification activities consistently assess the full range of project risks and performance.
5. **VVBs should focus on expanding and upskilling the pool of qualified auditors, while accreditation bodies and carbon-crediting programs should strengthen the competencies of their own reviewers** to ensure they can effectively assess all areas covered by validation and verification activities. Strengthening skills and capacity across both assurance providers and oversight functions is essential to addressing current constraints and supporting consistent, high-quality assessment as the market scales.
6. **To support consistent and credible evaluation of sustainable development and safeguard-related outcomes, CCP-Eligible programs should assess and, where appropriate, recognise equivalency with relevant international standards.** This can reduce duplication, improve comparability across programs and support efficient assurance practices while preserving program discretion over the application of equivalency.
7. **The ICVCM should require carbon-crediting programs to implement coordinated, risk-based oversight systems for VVBs that complement accreditation body oversight.** Clearer coordination, structured information sharing and alignment between programs and accreditation bodies would strengthen system-wide visibility of VVB performance, reduce oversight gaps and inefficiencies, and support more effective, outcome-focused supervision of validation and verification activities across the market.
8. **The ICVCM should support the development of a common, risk-based framework to guide the depth and focus of validation and verification activities**, combining country-level and project-type risk, including social and environmental safeguards considerations. Such an approach would help align audit expectations and effort across programs, reduce inconsistent treatment of similar risks and support credible and proportionate assurance as the market scales.
9. **Carbon-crediting programs should strengthen requirements to safeguard impartiality and manage conflicts of interest in VVB services**, including through clearer rules on prohibited relationships, fee arrangements and repeat engagements. Greater consistency and coordination across programs and accreditation bodies would help ensure that both actual and perceived conflicts are addressed in a credible and transparent manner.
10. **The ICVCM and carbon-crediting programs should strengthen transparency around validation and verification engagements and outcomes** to improve accountability, comparability and confidence in assurance processes across the market. Clearer expectations on timelines, engagement status, information disclosure and audit finalisation, supported by consistent reporting and greater use of digital tools, would help prevent unresolved issues, reduce opacity and reinforce the credibility of validation and verification outcomes as the market scales. Digitalisation and template harmonisation could serve as potential enablers of efficiency and comparability.

In addition to the recommendations outlined above, the CIWP discussions identified two areas that were documented as observations and considerations relevant to VVB performance rather than advanced as formal recommendations.

First, some participants noted that alternative contracting and payment models between carbon-crediting programs and VVBs could, in certain contexts, improve efficiency and predictability of validation and verification processes, provided that such approaches are carefully designed to manage risks to impartiality in both perception and practice and are supported by robust governance, oversight and conflict of interest safeguards. Such alternative contracting and payment models for VVB services, including the use of digitalisation, may positively influence perceptions of impartiality.

Second, participants highlighted the potential benefits of progressively strengthening digitalisation and alignment of validation and verification templates and reporting practices to reduce duplication, improve comparability and support more efficient oversight. In both cases, digitalisation, including ongoing work on digital MRV and emerging digital and AI-enabled tools, was identified as a potential enabler of more efficient, streamlined and scalable validation and verification processes, warranting further exploration.



Next steps

The outputs of this CIWP will inform further refinement of the CCP Assessment Framework and signal broader evolutions needed to strengthen validation and verification systems across carbon markets. While some recommendations are directed to the ICVCM, others are intended for carbon-crediting programs, accreditation bodies, VVBs and wider market actors, reflecting the distributed nature of oversight responsibilities.

Insights from this CIWP will also feed into related and future continuous improvement work, including the CIWP on Digital MRV. The ICVCM will continue to consider how cross-cutting issues identified across CIWPs can be addressed in a coherent and coordinated manner, supporting the effective implementation of recommendations and the continued evolution of high-integrity carbon markets.

Oversight of Validation and Verification Bodies

Introduction

The Integrity Council for the Voluntary Carbon Market (ICVCM) is an independent, multi-stakeholder-led governance body. The ICVCM sets and maintains a voluntary global threshold standard for integrity in the verified carbon market. The threshold standard is based on the ICVCM's Core Carbon Principles (CCPs) and is implemented through an Assessment Framework that defines what high quality means by reference to those principles.

The ICVCM's Continuous Improvement Work Programs (CIWPs) advance the evolution of the carbon market by harnessing the latest science, emerging technologies and innovative approaches. CIWPs bring together leading market experts and key stakeholders in a collaborative process to address complex market challenges, explore areas for increased ambition and identify pathways to strengthen integrity across the market.

Each CIWP focuses on a specific challenge or opportunity affecting the integrity and effectiveness of verified carbon credits. Its role is to develop a shared understanding of the issue, evaluate emerging best practices and identify options to strengthen market integrity and ambition. This CIWP focuses on the role of validation and verification bodies (VVBs) and the oversight of their performance within carbon markets.

VVBs are independent third-party organisations accredited to validate the design and verify the implementation of greenhouse gas (GHG) mitigation activities. Their work underpins the credibility, transparency and environmental integrity of carbon credits across both voluntary and compliance carbon markets.

VVBs operate within a broader institutional framework (see [Box 1](#) and [Annex 2](#)). Accreditation bodies assess and accredit VVBs against recognised international standards, while carbon-crediting programs are responsible for overseeing VVB performance within their respective standards and activities, including through eligibility requirements, procedures and performance management mechanisms. As the market continues to scale and evolve, additional clarity and more robust, system-wide arrangements can help ensure consistently high levels of quality and support the effective management of increased complexity, particularly in relation to sustainable development and social safeguards.

The CCP Assessment Framework acknowledges that third-party auditing (verification and validation) is a fundamental element of ensuring accuracy, consistency, transparency and integrity in carbon crediting. Within the CCP Assessment Framework, requirements relating to third-party validation and verification draw on provisions originally developed under the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) eligibility requirements. The requirements are reflected across multiple integrity principles within the Assessment Framework, including governance (for example, on issuance errors and robust third-party auditing criteria), sustainable development benefits and safeguards (relating to environmental and social impacts) and emissions impact (including additionality and quantification), see [Box 2](#).

BOX 1

The VVB ecosystem

VVBs operate within a multilayered institutional ecosystem shaped by accreditation programs, international recognition arrangements and carbon-crediting program-level requirements. VVBs are accredited by national accreditation bodies applying internationally recognised standards for GHG validation and verification, including relevant ISO standards. Many accreditation bodies participate in international mutual recognition arrangements, supporting consistency and reducing duplication across jurisdictions.

Within this framework, VVBs may be part of different organisational forms, including multinational testing, inspection and certification firms, environmental certification bodies and specialised carbon-focused entities. They deploy sector-specific auditors and technical experts and are subject not only to formal accreditation oversight but also to additional eligibility, performance and conduct requirements set by carbon-crediting programs. Together, these overlapping layers of accreditation, program-level recognition and ongoing oversight create a complex system that provides multiple safeguards but also gives rise to interactions and challenges that must be addressed through a system-wide, integrated approach.

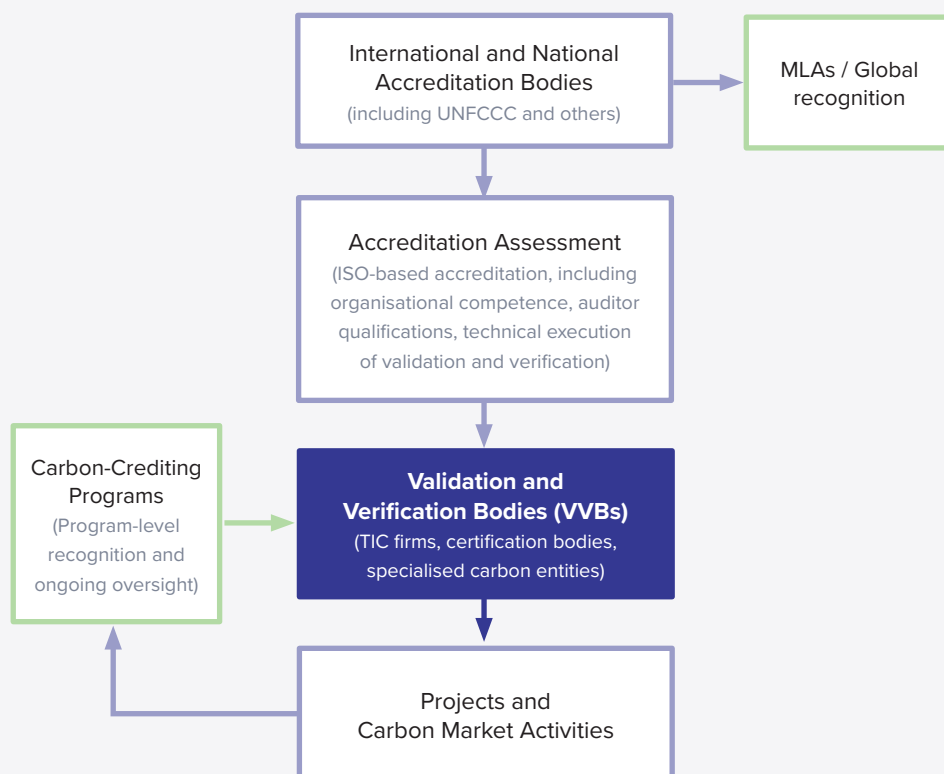


Figure 1. Overview of the institutional layers within which VVBs operate, including accreditation bodies and international recognition arrangements, carbon-crediting program requirements and the organisational and sectoral structures through which VVBs deliver validation and verification services.

BOX 2

Relevant CCP Assessment Framework requirements

In the CCP Assessment Framework requirements for carbon-crediting programs, criterion 4.1 on robust independent third-party validation and verification establishes expectations for how carbon-crediting programs oversee and ensure the competence, independence and performance of VVBs:

In addition to CORSIA requirements, in relation to validation of mitigation activities and verification of GHG emission reductions and removals, the carbon-crediting program shall:

- 1) *require validation and verification bodies (VVBs) to be accredited by a recognised international accreditation standard (e.g., according to the current edition of ISO 14065 and ISO 14066, or per rules relating to the UNFCCC Kyoto Protocol Clean Development Mechanism or Paris Agreement Article 6, paragraph 4 Supervisory Body);*
- 2) *have a process for managing VVB performance, including systematic review of validation and verification activities, reports and remedial measures to address performance issues including measures to ensure that poor VVB performance is reported to the relevant accreditation body, and provisions to suspend or revoke the participation of a VVB in the carbon-crediting program.*

The CCP Assessment Framework contains further requirements for carbon-crediting programs that have implications for the role of VVBs in CCP-Eligible programs:

- **Criterion 2.1** – programs are required to have procedures to address erroneous issuance of carbon credits, which could cover VVBs;
- **Criteria 7.1–7.11** – requirement of confirmation in validated design documents of the mitigation activity's adherence to sustainable development safeguards and benefits, appropriate risk mitigation measures related to labour rights, land acquisition, biodiversity conservation and sustainable management of natural resources, Indigenous Peoples, local communities and cultural heritage, respect for human rights, gender equality and positive sustainable development impacts;
- **Criterion 8.2** – validation of regulatory additionality demonstration by the VVB and/or by the carbon-crediting program;
- **Criterion 8.3** – validation of prior consideration demonstration by the VVB and/or by the carbon-crediting program;
- **Criterion 8.5** – validation of all elements of the investment analysis by the VVB and/or by the carbon-crediting program;
- **Criterion 8.7** – validation of all elements of the market penetration/common practice assessment by the VVB and/or by the carbon-crediting program;
- **Criterion 8.8** – validation of all the criteria of the standardised approach to additionality demonstration by the VVB and/or by the carbon-crediting program;
- **Criterion 8.9** – validation/verification of the requirements for additionality demonstration in jurisdictional Reducing Emissions from Deforestation and Forest Degradation+ (jurisdictional REDD+).
- For CCP Attribute 3 on quantified positive sustainable development goals (SDG) impacts – verification of the quantification of positive SDG impacts according to the method, tool or standard.

This highlights that the role of VVBs in the market is complex and cross-cutting, and that strengthening VVB performance and oversight requires a holistic, system-wide perspective that extends beyond the oversight responsibilities of individual carbon-crediting programs.

The Summary for Decision Makers¹ in the CCP Assessment Framework signalled the need for a CIWP to examine best practice in third-party validation and verification across a range of interrelated areas, including:

- Best practice for accreditation, training and competency requirements for validators and verifiers;
- Review of existing oversight mechanisms of VVB performance and procedures including systematic monitoring and consequences for poor performance;
- Information and disclosure requirements for VVBs;
- Approaches to independent spot checks, document review and completeness checks of validation and verification documents as well as registry requirements;
- Approaches to triage, root-cause analysis and learning lessons when quality issues emerge for a project or credit type, category or methodology.

Using the CCP Assessment Framework as a baseline, the ICVCM undertook a non-exhaustive literature review, analysed feedback from the 2023 public consultation on the Assessment Framework and conducted a pre-CIWP participant survey in 2025. This process identified a set of key challenge areas requiring focused examination through the CIWP:

1. The role of VVBs in carbon markets
2. Carbon-crediting program oversight of VVBs
3. Shortage of VVBs, competency and staffing issues
4. Technical competency and validation/verification of sustainable development and safeguards
5. Conflicts of interest and structural incentives
6. Transparency and accountability in VVB performance

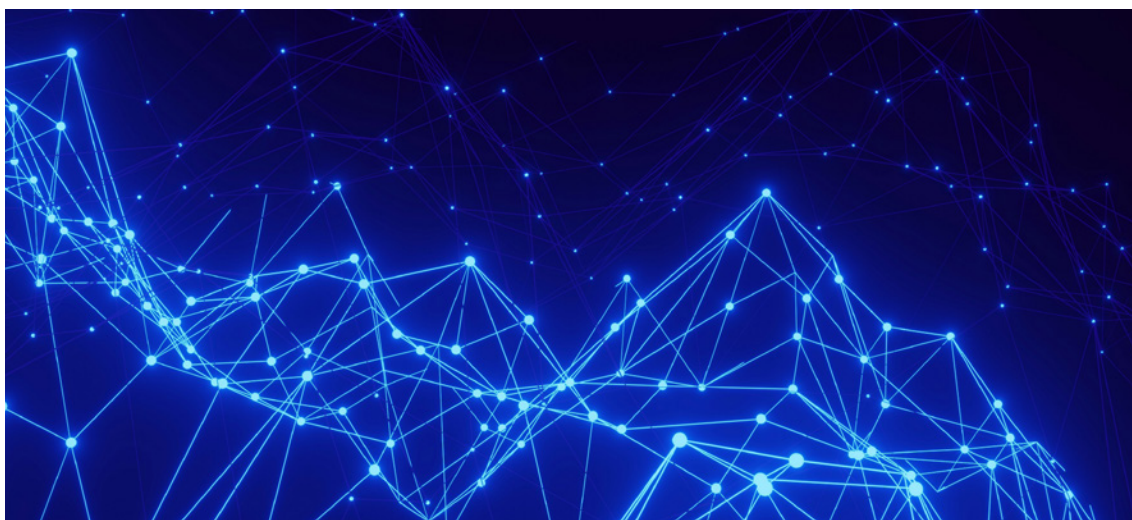
This CIWP sought to deepen understanding of these challenges, examine emerging best practices and innovative approaches to VVB performance oversight and assess how performance oversight mechanisms could be strengthened. The work focused on VVBs operating within independent carbon-crediting programs. The findings and recommendations of this CIWP aim to inform refinements to the Assessment Framework, as well as identify actions that could be taken by the ICVCM and other actors in the wider carbon market to strengthen the integrity of validation and verification systems.

¹ The [Summary for Decision Makers](#) was originally published in 2023, prior to the approval of the Article 6.4 Supervisory Body requirements applicable to the PACM in 2025. As such, the areas identified reflect the state of market standards and emerging practices at the time, with subsequent developments expected to further inform market evolution.

Background and scope of work

Prior to the definition of this work program's scope, several CIWPs had already identified and examined issues related to VVBs within their respective mandates. The CIWP on *Sustainable Development Benefits and Safeguards*² explored competency requirements related to environmental and social safeguards, while the CIWP on *Market Transparency, Scalability and Standardisation*³ considered issues related to VVB funding models (see [Box 3](#)). The CIWP on *Transition Credits*⁴ also examined the role of VVBs in developing appropriate technical competencies to assess transition crediting approaches.

These discussions highlighted that challenges related to VVB performance and oversight extend beyond the responsibilities of individual carbon-crediting programs and require a system-wide understanding of how VVBs operate in the market, where gaps persist and which actors are best placed to address them.



2 Integrity Council for the Voluntary Carbon Market (2025) [CIWP Sustainable Development Safeguards and Benefit Sharing report](#).

3 Integrity Council for the Voluntary Carbon Market (2026) [CIWP Market Transparency, Scalability and Standardisation report](#).

4 Integrity Council for the Voluntary Carbon Market (2026) [CIWP Transition Credits report](#).

Challenges in the roles and functions of VVBs

The challenges and complexities of validation and verification in the carbon market extend beyond the oversight of VVBs by carbon-crediting programs and accreditation bodies. Structural constraints and opportunities within the current system influence how effectively VVBs can support market integrity, particularly as the market scales and evolves.

The role of VVBs in carbon markets

VVBs play a critical role in the functioning of carbon markets. As independent third-party entities, they are responsible for validating mitigation activity design and verifying GHG emission reductions or removals in accordance with carbon-crediting program rules and methodologies. Their assessments provide the technical basis for project registration and credit issuance decisions. However, the role of VVBs is best understood within the broader institutional framework in which they operate, including the standards, program requirements and oversight arrangements established by carbon-crediting programs and accreditation bodies, as well as the contractual arrangements governing individual validation and verification engagements.

There can be a disconnect between the role VVBs are formally assigned within this framework, how their function is understood within the market, and broader public or stakeholder expectations of what third-party assurance should deliver. VVBs are sometimes perceived as providing a comprehensive assessment of the overall quality or integrity of projects and carbon credits. In practice, their responsibilities are mainly limited to assessing conformity against specified criteria and requirements within the scope of a particular validation or verification engagement. Responsibilities for regulatory enforcement, legal compliance and investigation of alleged misconduct generally lie with other actors within the broader ecosystem.

This distinction can create challenges in how VVB responsibilities, limitations and performance are understood, supported and overseen across the market. These challenges may be amplified by fragmented oversight arrangements involving multiple carbon-crediting programs and accreditation bodies operating across jurisdictions and market segments.

Carbon-crediting program oversight of VVBs

Carbon-crediting programs play a central role in overseeing VVB performance, including determining eligibility, reviewing validation and verification outputs and addressing performance risks. While many programs have strengthened program-level oversight arrangements over time (see more in [Annex 2](#)), approaches to monitoring and reviewing VVB work vary across the market, raising questions about consistency, comparability and the effectiveness of assurance outcomes as the market scales.

Programs also face challenges in overseeing VVB performance beyond individual projects. Project-level reviews alone may be insufficient to identify persistent quality issues, conflicts of interest or weaknesses in organisational governance and quality management systems. Fragmented oversight across programs and accreditation bodies, limited information sharing and differences in review practices and reporting formats further constrain the ability to form a holistic view of VVB performance across the market and add to operational complexity for VVBs themselves.

Shortage of VVBs, competency and staffing issues

A persistent challenge in carbon markets is the limited availability of VVBs and qualified validation and verification personnel. The number of VVBs active across major carbon-crediting programs remains relatively small,⁵ with capacity constraints becoming more acute as market demand has increased and is expected to continue to scale. These constraints are particularly evident in relation to the availability of qualified local auditors, with shortages in underrepresented regions contributing to reliance on a narrow pool of providers and longer validation and verification timelines.

Beyond overall capacity, limitations in sectoral and technical competencies also pose challenges. Not all VVBs are accredited or resourced to operate across the full range of sectoral scopes or methodological complexity present in the market, and developing and maintaining specialised expertise can be resource intensive. Together, these capacity and competency constraints place pressure on VVBs and carbon-crediting programs and have implications for the timeliness and consistency of assurance outcomes.

Technical competency and validation/verification of sustainable development and safeguards

The CCP Assessment Framework requirements and overall market expectations expand the scope of validation and verification by elevating safeguards and sustainable development considerations from voluntary co-benefits to core elements of carbon integrity. As a result, validation and verification activities increasingly extend beyond GHG accounting to include the assessment of environmental and social risks, raising questions about whether VVBs consistently possess the expertise required to assess these requirements across different project types and contexts.

Assessing safeguards and sustainable development presents distinct challenges compared to GHG accounting, including greater reliance on qualitative judgment, less standardised metrics and constraints related to data availability and reliability. Human rights-related requirements add further complexity, as VVBs are not intended to operate as investigative bodies and typically focus on assessing conformity with documented procedures and monitoring systems rather than substantiating rights violations. These dynamics highlight challenges in how existing assurance models can effectively support expanded safeguards and sustainable development requirements while remaining within the defined mandate of VVBs.

Conflicts of interest and structural incentives

In most carbon-crediting programs, project proponents contract and remunerate VVBs directly for validation and verification services. This commercial arrangement has raised concerns among some stakeholders regarding potential conflicts of interest and structural incentives, particularly where the selection and payment of auditors rests with the entities whose activities are being assessed.

Accreditation standards and program-level requirements include provisions intended to manage these risks, such as independence and impartiality requirements and obligations for VVBs to identify and manage conflicts of interest. However, the significance of both financial and non-financial conflicts may vary depending on VVB size, business model and patterns of client relationships. These dynamics raise broader questions about how existing governance arrangements address both real and perceived conflicts of interest while maintaining the independence and effectiveness of third-party validation and verification across the market.

⁵ Based on an internal assessment conducted in 2025, prior to the start of this CIWP and covering 14 carbon-crediting programs, the review identified approximately 80 VVBs approved across those programs, of which 11 were approved under five or more programs. According to the [2024 CDM Synthesis Report](#), 10 entities accounted for approximately 99% of verifications in the most recent reporting period. The assessment also identified shortages of qualified local auditors, particularly in underrepresented regions, and limited coverage of all sectoral scopes, with only 8 of 28 DOEs accredited across all scopes under the CDM.

Transparency and accountability in VVB performance

Transparency and accountability are central to trust in validation and verification processes and to the integrity of carbon markets. Carbon-crediting programs are generally responsible for overseeing VVB performance and ensuring compliance with applicable requirements, including those set out in the CCP Assessment Framework. However, concerns have been raised regarding the visibility of validation and verification activities and the extent to which information on VVB performance is accessible to external stakeholders.

Limited document transparency and variation in disclosure practices across programs can make it difficult for independent reviewers and market participants to assess validation and verification quality or to form an informed view of VVB performance across the market. These dynamics raise questions about how transparency and accountability arrangements can be strengthened to support effective oversight of VVBs while balancing confidentiality considerations and the proper functioning of assurance processes.

To address these challenge areas, the CIWP brought together participants from across the validation and verification ecosystem, including accreditation bodies, VVBs, carbon-crediting programs, project developers, Indigenous Peoples' representatives, human rights specialists, intergovernmental organisations, research organisations and wider market experts. This broad participation was intended to reflect different perspectives and practical experience across the system.

The work program meetings took place online between September 2025 and February 2026 and were organised into five thematic sessions aligned with the identified challenge areas. In addition, a dedicated session focused on digital measurement, reporting and verification (MRV), recognising that many of the issues discussed are closely linked to emerging digital approaches and that insights from this work program would help inform future work on digital MRV.

Outcomes and recommendations

The CIWP's results and recommendations are organised according to their areas of impact and interconnections. Many individual recommendations address multiple challenge areas at once, reflecting the position of VVBs within the market and their interdependencies with other actors and outcomes across the system. The order of presentation does not indicate relative importance; all recommendations are highly relevant for contributing to scaling integrity in the market.

Each outcome section includes contextual supporting information to help the reader better understand its applicability and relevance and is based on the working group discussions. The full set of recommendations as forwarded by the working group is set out in the main report and [Annex 1](#).

8.1 The ICVCM should establish minimum reporting and transparency requirements for CCP-Eligible programs related to VVB performance.

The following actions would support effective implementation of this recommendation:

- a. These requirements could be introduced through a phased approach, beginning as guidance or best-practice recommendations, then evolving into formal requirements once tested and refined.
- b. Key reported information would be made publicly available in a constructive, non-punitive manner, avoiding 'name and shame' approaches. However, actors who cross a clearly defined line into fraud should not be protected by confidentiality provisions.
- c. A standard reporting template should be developed to ensure comparability across carbon-crediting programs, setting out common categories of information to be reported on VVB performance (for example, program oversight activities, patterns in non-conformities, timelines for issue resolution, use of witness audits and referrals to accreditation bodies, where relevant).

Greater transparency and consistency in how carbon-crediting programs oversee and manage VVB performance can strengthen confidence in validation and verification outcomes and support accountability across the market. Establishing minimum reporting and transparency expectations would help make oversight practices by CCP-Eligible programs more visible and comparable, while respecting the independence of VVBs and the diversity of program designs.

A phased approach to implementation would allow carbon-crediting programs time to adapt data collection and reporting systems and to test standardised metrics before formal requirements are introduced. Transparency measures were seen by the working group as most effective when applied in a constructive, non-punitive manner for issues related to technical competence or process improvement. However, clear distinctions are needed where VVB practices would cross into fraud or other illegal conduct, which should not be shielded by confidentiality provisions.

Standardised reporting templates can support comparability across programs by setting out common categories of information on VVB performance, such as oversight activities, patterns of non-conformities, issue-resolution timelines and referrals to accreditation bodies. Clear performance criteria, governance safeguards and appropriate appeal or review mechanisms are important to ensure fairness, objectivity and protection against reputational harm arising from unsubstantiated allegations.

Overall, minimum transparency requirements are viewed as a means to improve oversight quality and trust in the assurance system, rather than as a tool to penalise VVBs, and to support effective risk-based supervision across the market.

8.2 Carbon-crediting programs should define a tiered rectification framework for VVBs. It could range from corrective action plans for minor mistakes all the way to suspension for major, material mistakes, and in cases of severe over-issuance unrelated to calculation methods set out in the methodology, assigning proportionate responsibility to VVBs, including obligations for restitution or restatement of validation and verification outcomes and undertaking corrective audit work where needed.

The following actions would support effective implementation of this recommendation:

- a. The ICVCM should set minimum requirements for VVB rectification applicable across carbon-crediting programs.
- b. Carbon-crediting programs should track cases where significant discrepancies are found between VVB-submitted verification requests and credits deemed eligible during program review.

Clear and proportionate rectification mechanisms are an important element of effective oversight of validation and verification activities. Currently, accountability for material errors that contribute to over-issuance of credits is uneven across programs, which can weaken incentives for diligence and quality assurance in VVB work. Establishing a tiered rectification framework would help ensure that material mistakes are addressed consistently and transparently.

A graduated approach, ranging from corrective action plans for minor technical errors to suspension or other sanctions for serious underperformance, would allow programs to respond proportionately to issues of different severity. Distinguishing between discrepancies arising from methodological limitations and those resulting from VVB underperformance is essential, as the appropriate response differs in each case. The scope of this recommendation is limited to technical performance failures and does not address fraudulent behaviour, which requires separate and more severe responses.

Carbon-crediting programs may track significant discrepancies between verification requests submitted by VVBs and credits ultimately deemed eligible by the program as a practical indicator for identifying cases that warrant further review or rectification. Such mechanisms are particularly relevant in risk-based oversight systems where not all projects are subject to full review.

Participants emphasised that rectification frameworks should balance accountability with fairness. Proportionate responsibility should apply only where errors are attributable to VVB performance, and rectification obligations should not create disincentives that further constrain VVB capacity. Harmonised minimum expectations across programs would support consistent application and help avoid competitive distortions while preserving flexibility for programs to design complaint-handling and performance-management processes suited to their governance structures.

8.3 The ICVCM should develop a harmonised⁶ definition of the boundaries of VVBs' responsibilities, particularly regarding due diligence of mitigation activities and legal compliance by project participants (e.g. human rights, anti-money laundering).

The following actions would support effective implementation of this recommendation:

- a. The ICVCM should conduct a mapping exercise of carbon-crediting programs' screening practices, audit assurance activities and accreditation body enforcement, focusing on legal and compliance areas. Based on this mapping, the ICVCM should develop a list of minimum expected checks by different actors, clarifying and harmonising responsibility boundaries without reducing existing carbon-crediting program criteria.
- b. The ICVCM should propose guidelines for VVBs on when and how to report suspected illegal or unethical activities, both within and beyond their audit scope.
- c. The ICVCM should coordinate improved communication and outreach to clarify the role and value of VVBs to market stakeholders, highlighting their strengths and contributions to integrity.

VVBs play a critical role in carbon markets, yet their role and value are not always clearly understood or sufficiently reflected in broader discussions on carbon credit quality. In particular, the broader public may expect VVBs to address issues that extend beyond their defined assurance role, such as matters more appropriately handled through regulatory, legal or enforcement frameworks. Clarifying the boundaries of VVB responsibilities is therefore important to ensure that VVBs are not overburdened with activities outside their accreditation scope and that legal compliance is managed by actors with clearly defined mandates.

Participants of the working group highlighted the need to harmonise definitions of VVB responsibilities, clearly specifying both what VVBs are expected to do and what falls outside their remit. In this context, for issues that arise outside the specific claims being validated or verified, VVBs were generally viewed as appropriate first-line flaggers of potential concerns, such as suspected fraud or human rights risks, rather than full-scale investigators. Clear reporting channels, guidance and protections are therefore important to enable VVBs to escalate concerns that fall outside their audit scope appropriately, including to carbon-crediting programs or authorities where required by law.

Clarifying responsibilities also requires distinguishing among different types of checks that are needed in the overall assurance of carbon credits. Screening and due diligence of carbon-crediting project owners were identified as distinct activities with different cost, time and competency implications. While carbon-crediting programs may conduct screening or client checks, legal due diligence typically involves specialised expertise and resource-intensive processes. VVBs, by virtue of their on-the-ground presence and technical role, may contribute to certain due diligence activities within their audit scope, but this does not replace the responsibilities of carbon-crediting programs or other

⁶ In this report, the term 'harmonised' refers to requirements that remain independently defined by each carbon-crediting program but are aligned such that they are consistent, mutually compatible and not in conflict with one another. Harmonisation in this context does not imply uniformity or identical rules across programs.

market actors to undertake Know-Your-Customer client verification processes. Due diligence efforts undertaken by buyers, investors, rating agencies or intermediaries were viewed as complementary to, rather than substitutes for, accredited third-party validation and verification.

Participants also noted that clearer definitions of roles and competencies would help align expectations across the market, improve accountability and streamline validation and verification processes. For example, a lack of clarity regarding the roles and responsibilities of different actors inhibits carbon-crediting programs from setting consistent requirements. In assigning responsibilities, attention should be paid to the relationship between risk, liability and remuneration, as the potential liability exposure faced by VVBs, particularly for large or jurisdictional projects, may be disproportionate to the professional fees associated with individual validation or verification engagements.

This issue is closely connected to the role of VVBs within the broader assurance framework and was explored in *CIWP Market Transparency, Scalability and Standardisation*,⁷ with further detail provided in [Box 3](#). This question was not addressed in the CIWP Oversight of VVBs discussions.

8.4 The ICVCM should clarify expectations for VVBs to possess and apply multidimensional competencies (spanning GHG assessment, environmental and social safeguards, sustainable development goals (SDG) impact assessment and financial review for additionality) so that validation and verification activities reliably assess the full spectrum of project performance and risks.

The following actions would support effective implementation of this recommendation:

- a. Carbon-crediting programs should align their VVB eligibility and audit requirements to broaden the scope of VVB competence requirements to consistently include social and environmental safeguards and SDG impacts, supported by harmonised requirements for these competencies in VVBs' audit teams and the audit scope that could be adopted across carbon-crediting programs.
- b. A competency matrix for VVBs should be developed by a multi-stakeholder effort led by the ICVCM.
- c. Carbon-crediting programs should require VVBs to ensure that diverse competencies (GHG quantification, social and environmental safeguards, local knowledge and legal awareness) are included in the audit team. Competency requirements should apply to carbon-crediting program staff as well, who conduct final reviews of VVBs' work prior to project registration or issuance.

Existing accreditation and ISO standards for VVBs, i.e. ISO 17011, ISO 17029:2019, ISO 14065:2020 and ISO 14066:2023, provide a strong technical foundation but were not designed to comprehensively address the assessment of environmental and social safeguards or sustainable development impacts. While some carbon-crediting programs have introduced additional requirements in these areas, approaches remain uneven across the market, creating variability in assurance outcomes.

Clearer competency requirements, covering safeguards, SDG impacts and a code of ethics, would help ensure that validation and verification activities consistently assess the full scope of project risks and performance. At the same time, participants recognised that not all competencies may be held in-house by a single VVB. As such, new requirements should allow flexibility to draw on external expertise while maintaining clear accountability within the audit team. Competency expectations were seen as most effective when applied upfront, before audit activities begin, to avoid identifying gaps only after validation or verification has been completed.

⁷ Integrity Council for the Voluntary Carbon Market (2026) [CIWP Market Transparency, Scalability and Standardisation report](#).

BOX 3

Reasonable assurance and VVBs

Discussions in *CIWP Market Transparency, Scalability and Standardisation* highlighted a growing interest in whether carbon credits could, over time, meet the expectations of financial markets for ‘reasonable assurance’, a level of assurance commonly applied in financial reporting. This question is being driven by several factors, including increasing interest from institutional investors, the integration of carbon credits into audited corporate climate disclosures and the potential for future policy recognition of high-integrity carbon markets.

In financial reporting, reasonable assurance refers to a high, though not absolute, level of confidence, supported by standardised audit processes, internal controls and testable evidence. By contrast, the current system of validation and verification in the carbon market is based on ISO-aligned frameworks focused on environmental performance. While these processes provide important assurance on project-level outcomes, they are not designed to meet financial audit standards. The use of similar terminology across these contexts has led to some confusion, and participants emphasised the need for clearer distinctions to avoid misinterpretation by market participants.

This distinction has practical implications. At present, major audit firms remain cautious about providing reasonable assurance over carbon credits, citing the absence of consistent accounting and assurance frameworks for this asset class. As a result, carbon credits are not routinely treated as auditable assets in financial statements, which limits their use in structured finance, constrains price discovery and affects the scale of institutional participation.

The *CIWP Market Transparency, Scalability and Standardisation* work program recommended that the ICVCM should refine its requirements related to reasonable assurance, documentation and audit trails, aligned with established financial market assurance practices such as ISAE, IOSCO or ISDA standards. This would involve defining a minimum threshold for reasonable assurance, incorporating elements such as standardised audit scope and depth, documented materiality thresholds, evidence-based testing procedures, transparent treatment of uncertainty and traceable audit documentation.

Participants emphasised the need to distinguish between existing certification frameworks for VVB oversight and the requirements associated with financial statement audits. Moving towards finance-grade assurance would likely require more consistent, auditable systems across the lifecycle of credits, including issuance, transfer and retirement. As an initial step, further work could focus on clarifying terminology, assessing the feasibility and implications of different approaches and engaging with relevant stakeholders.

While these topics were not explored in depth in the *CIWP Oversight of VVBs*, they are closely linked to questions of VVB competencies and the broader evolution of assurance practices in the market. Further work will be needed and is encouraged to explore feasibility, implications and alignment with emerging accounting and auditing frameworks.

Participants noted that expanding competency requirements may increase costs and timelines, highlighting the importance of proportionate, risk-based application, particularly for smaller or community-based projects.

This recommendation aligns with findings from the CIWP on Sustainable Development Benefits and Safeguards, which identified the need to strengthen validation and verification of environmental and social safeguards and SDG impacts.

8.5 VVBs should focus on expanding and upskilling the pool of qualified auditors. Accreditation bodies and carbon-crediting programs should strengthen the competencies of their reviewers as well, to cover all the evaluated areas.

The following actions would support effective implementation of this recommendation:

- a. International standards bodies, in collaboration with carbon-crediting programs and relevant market actors, should develop and establish credentialing systems and global auditor databases for VVBs and individual qualified auditors to ensure appropriate expertise is identified and applied to validation and verification activities.
 - A catalogue of accepted training routes could promote portability of competence evidence across programs.
- b. The ICVCM should coordinate with ISO, Global Accreditation Cooperation Incorporated (Global ACI)⁸ and relevant market actors for the establishment of a harmonised training platform and formal recognition mechanisms for auditor competences.

A persistent constraint on the integrity and scalability of carbon markets is the limited pool of qualified auditors with the technical and contextual expertise, as well as soft skills, required for robust validation and verification. While targeted training is important, capacity constraints were not seen by the working group solely as a training issue and extend across the broader assurance ecosystem, including accreditation bodies and carbon-crediting programs.

Existing expertise in related audit disciplines, such as social auditing or sector-specific environmental assessment, could be leveraged through additional training to support validation and verification activities, particularly in regions where carbon market activity is expanding rapidly. Capacity challenges are especially acute in regions such as sub-Saharan Africa, where demand for validation and verification services is growing faster than local expertise.

Participants highlighted the potential value of more structured and portable credentialing approaches, including recognised training pathways, auditor databases and harmonised recognition of competences. Such approaches could reduce reliance on self-declarations of competence, improve transparency and support more effective matching of expertise to project needs.

Efforts to expand and formalise training and credentialing should avoid creating unnecessary barriers to entry or excessive costs that could further constrain auditor supply. Proportionate, accessible approaches to capacity-building, supported by collaboration among standards bodies, accreditation bodies, carbon-crediting programs and the ICVCM, were viewed as key to strengthening auditor competence across the system while supporting market growth. At the same time, clear separation of roles remains important: VVBs retain responsibility for workforce development, while accreditation bodies continue to assess and confirm competences.

⁸ Global ACI became operational on 1 January 2026, replacing the former roles of the International Accreditation Forum (IAF) and the International Laboratory Accreditation Cooperation as the global accreditation authority, including for VVBs.

8.6 To support consistent, credible evaluation practices of SDG- and safeguard-related reporting and avoid duplication, CCP-Eligible programs should evaluate international standards (e.g. FSC, Rainforest Alliance, A6.4 SD Tool) with the objective of recognising equivalency for mitigation activity reporting and evaluation of these topics.

The following actions would support effective implementation of this recommendation:

- a. Where possible, recognised equivalent standards should be referenced instead of creating new frameworks.
- b. A technical group, which could be convened by the ICVCM or a different actor and include CCP-Eligible programs, accreditation bodies and subject matter experts, should assess which standards have equivalence.
 - Procedures should be defined to ensure that carbon-crediting programs can consistently rely on recognised equivalent standards, including through measures such as document review, sampling or secondary checks.
 - Programs must retain the final authority to determine when and how equivalency applies, even within a harmonised framework.

The proliferation of standards and frameworks across carbon markets and environmental and sustainability certification schemes creates challenges for the consistent evaluation of safeguards and sustainable development outcomes and can lead to duplication of effort. Similar challenges have been addressed in other sectors through structured equivalency or benchmarking approaches, which demonstrate that recognising equivalence across standards can support consistency while avoiding the creation of parallel or overlapping requirements.

Leveraging existing, well-established international standards, where they demonstrably meet equivalent objectives, can reduce audit burden, improve efficiency and support more coherent assurance practices across carbon-crediting programs. Accreditation bodies associated with these external standards already assess auditor competencies, which can help ensure that evaluations remain credible and consistent when such standards are recognised for use in reporting SDG- and safeguard-related results in the carbon market context.

Where gaps exist between recognised standards and carbon-crediting program requirements, targeted gap assessments can be used to address specific deficiencies rather than duplicating complete assessments. This approach supports proportionality and efficiency while preserving program authority over how and when equivalency is applied.

8.7 The ICVCM should require carbon-crediting programs to implement a risk-based oversight system of VVBs that does not overlap with accreditation bodies' oversight of VVBs and includes, at a minimum, program-specific approval processes, project-level reviews, site visits, witness audits, non-conformance tracking and checks on real-world conditions.

The following actions would support effective implementation of this recommendation:

- a. The ICVCM should engage accreditation bodies directly and encourage alignment of rules on oversight of VVBs across carbon-crediting programs through Global ACI structures.
 - Carbon-crediting programs and accreditation bodies should tailor their respective oversight activities to avoid overlap and strengthen overall oversight.

- b. The ICVCM should require that CCP-Eligible carbon-crediting programs establish and maintain a coordinated, structured feedback and information-sharing system with accreditation bodies.
 - The minimum set of information to be shared with accreditation bodies should include VVB activity levels (including contracted projects), trends in non-conformities, significant incidents and program-level guidance.
 - CCP-Eligible programs should recognise and address practical and logistical constraints affecting accreditation bodies' ability to oversee VVBs effectively, including constraints related to delayed or short-notice information sharing (for example, around VVB site visits).
- c. Accreditation bodies should consider additional oversight methods beyond current approaches, where witness assessments are not delivering full project assessment insights.

Participants highlighted that effective oversight of VVBs requires a coordinated, risk-based system that draws on the complementary roles of carbon-crediting programs and accreditation bodies rather than duplicative controls. Accreditation bodies typically assess management systems and procedures, while carbon-crediting programs generate insights through detailed project-level reviews and program-specific oversight. When these perspectives are not systematically aligned or shared, material performance issues may go undetected or be addressed inconsistently.

Experience across programs indicates that current oversight arrangements are fragmented: carbon-crediting programs often recreate accreditation-like processes, while accreditation bodies may lack visibility into project-level outcomes. Structured feedback and information-sharing between programs and accreditation bodies was therefore identified as critical to strengthening oversight, accelerating corrective actions and reducing reliance on informal or anecdotal information that cannot be acted upon.

Participants also emphasised that oversight should focus on real-world performance, not only documented systems. Project-level reviews, site visits, witness audits and checks on actual implementation provide insights that are difficult to capture through procedural audits alone. At the same time, practical and logistical constraints, such as limited notice for site visits or delayed access to information, can reduce the effectiveness of accreditation body oversight if such constraints are not explicitly recognised and addressed.

A coordinated, risk-based oversight framework, supported by information-sharing expectations and engagement through Global ACI structures, was viewed as a way to improve consistency, avoid unnecessary duplication and strengthen market-wide intelligence on VVB performance. Such an approach would allow each actor to focus on its comparative strengths while supporting more timely, coherent and outcome-focused oversight across validation and verification services.

8.8 A multi-stakeholder initiative led by the ICVCM should develop a standardised risk matrix taxonomy for validation and verification activities that combines country-level and project-type risk to guide audit depth and focus.

The following actions would support effective implementation of this recommendation:

- a. Audit requirements should be defined objectively and based on risk, with harmonisation of risk identification and drivers across programs, countries, project types and the level of social and environmental safeguards risk associated with the activity.

- b. The standardised risk matrix should start with minimum requirements and be updated periodically, as risk information may change over time.
- c. Carbon-crediting programs should establish guidelines or project-specific expectations for the level of professional effort required, such as indicative ranges of auditor days or other effort metrics, to help deter underpaying, understaffing or using insufficient time from qualified personnel that can undermine quality in practice.

Validation and verification activities vary significantly across project types, geographies and risk contexts. A harmonised, risk-based approach can help prioritise audit effort towards higher-risk contexts and support more consistent and credible assurance outcomes across carbon-crediting programs.

A standardised risk matrix combining country-level and project-type risk and drawing on established models from other sectors could provide a structured framework to guide audit depth and focus. Such a tool would help reduce arbitrary variation between audits of similar scope, support alignment across programs and ensure that validation and verification efforts remain focused on material risks rather than procedural formalities.

At the same time, the proposed risk matrix should function as a supporting tool rather than a prescriptive rulebook. It would complement, not replace, professional judgment and existing requirements for VVBs to conduct strategic risk analysis and develop evidence-gathering plans tailored to project-specific circumstances. Defining indicative expectations for audit effort, such as effort ranges rather than fixed minimums, can help identify under-resourced audits while preserving flexibility across diverse project contexts.

A phased and adaptable approach to developing and updating the risk matrix would allow for learning over time and accommodate changing risk profiles. Increased transparency around audit effort and review outcomes may further support accountability and reduce incentives to undercut audit quality.

8.9 Carbon-crediting programs should strengthen requirements for impartiality and avoiding conflicts of interest in VVBs' services.

The following actions would support effective implementation of this recommendation:

- a. The ICVCM should require carbon-crediting programs to implement a prohibition, either absolute or clearly defined, on consulting–audit combinations for the same client across all carbon-crediting programs, including via affiliate companies, and prohibit corporate/contractual linkages when these compromise independence. Risk analysis must be applied to scrutinise and restrict problematic relationships and document why residual risks are acceptable.
- b. The ICVCM should require carbon-crediting programs to explicitly codify and define perceived impartiality with mandatory screening for relationship risks (e.g. prior engagements, family or business ties) and clear thresholds where activity must be declined if perceived risks cannot be reduced to an acceptable level.
- c. The ICVCM should require carbon-crediting programs to require that VVBs generate frontloaded invoicing (e.g. significant pre-outcome payments) to reduce outcome-linked incentives.
- d. Carbon-crediting programs should publish guidance on acceptable fee structures and require VVB declarations that no compensation element is contingent on a positive statement.

- e. With ICVCM stewardship, carbon-crediting programs should develop a centralised, cross-program mechanism for conflict of interest definition, declaration, information sharing and coordinated sanctions so that VVB issues identified by one program trigger system-wide visibility and action. There should be coordination with accreditation bodies to avoid oversight silos.
- f. The ICVCM should include guidance or requirements for VVBs relating to one-time or rotation-based models (caps on consecutive audits per activity/developer/owner) and require enhanced impartiality checks where repeated engagements are unavoidable.
 - The ICVCM should expand rotation requirements to cover not only VVBs but also the individual auditors assigned to an activity.

Impartiality and avoidance of conflicts of interest are fundamental to the credibility of validation and verification. While existing ISO standards and many carbon-crediting programs already include requirements addressing conflicts of interest, such as prohibitions on contingent fees, rotation rules and case-specific risk assessments, approaches vary across programs and do not consistently address all structural or perceived risks. Some participants also highlighted that integrity considerations related to conflicts of interest extend across the full assurance chain, from standard setters and program owners to accreditation bodies, VVBs and project developers, and noted that inconsistencies in existing standards may contribute to gaps in how conflicts of interest are addressed.

Shared participants' experience indicated that certain arrangements, including consulting–audit combinations, repeated engagements with the same project developer and corporate or contractual linkages through affiliate entities, can undermine both actual and perceived independence. Current standards do not always explicitly address risks arising from related entities, creating the potential for inconsistent application across programs. Perceived impartiality is particularly important, as even technically sound audits can lose credibility where external stakeholders perceive bias or undue familiarity.

Strengthening and harmonising requirements across carbon-crediting programs can reduce ambiguity and improve system-wide oversight. Clearer rules on prohibited relationships, front-loaded fee structures, rotation of both VVBs and individual auditors and mandatory screening for perceived conflicts can help mitigate incentive-related risks while preserving professional judgment. It was noted that more prescriptive approaches, such as absolute prohibitions with defined look-back periods, could further reduce ambiguity in determining where conflicts of interest arise. Limitations of front-loading fees have also been highlighted, with options suggested for neutral third parties controlling fee disbursement.

Greater coordination and information-sharing across programs, and with accreditation bodies, would also help ensure that conflicts of interest identified in one context are visible across the system. Such measures were viewed as necessary to support consistent enforcement, avoid oversight silos and maintain trust in the independence of validation and verification activities.

During discussions, participants observed that carbon-crediting programs could engage VVBs directly to streamline contracting and standardise timelines. However, caution was stressed, as such approaches may be adopted selectively depending on program-specific incentives and operational considerations.

Though this was not advanced as a recommendation, the following actions and considerations were raised:

- If carbon-crediting programs pay VVBs directly, this should be paired with robust governance, oversight procedures and enforceable sanctions.

- Carbon-crediting programs could evaluate any funding model against impartiality risks in both perception and practice before adoption and during operation.
 - Implementation may be practical if interaction among carbon-crediting programs, VVBs and project owners is digitalised, and therefore this observation should be brought to the CIWP on Digital MRV.
- If carbon-crediting programs do not pay VVBs directly, they could focus on establishing consistent minimum audit and competence requirements.

Participants raised the possibility that direct engagement between carbon-crediting programs and VVBs could, in some circumstances, help streamline contracting processes and improve predictability of timelines. Direct engagement could address the perception that the mere payment for services of project developers to VVBs affects their impartiality. At the same time, it was emphasised that any such model would need to be accompanied by robust governance arrangements, clear oversight procedures and enforceable safeguards to preserve VVB independence and avoid new conflicts of interest.

Fee structures were identified as highly context-specific, varying significantly by project type, geography and risk profile. Fixed or standardised fees were viewed as inappropriate, as they may discourage adequate resourcing of complex audits and undermine quality. Regardless of the payment model used, participants highlighted the importance of focusing on minimum audit and competency expectations rather than harmonising fee levels.

It was also noted that changing who pays the VVB does not by itself resolve impartiality risks. Conflicts of interest can arise from structural, financial and governance factors and must be addressed through complementary measures such as clear role separation, transparency requirements and strong conflict of interest controls. Digitalisation of engagement processes was identified as a potential enabler of more efficient contracting and oversight and was seen as relevant to work under the CIWP on Digital MRV.

Overall, both carbon-crediting program payment and project-proponent payment models were viewed as potentially viable if designed carefully. Any approach should be evaluated against risks to impartiality in both perception and practice and supported by consistent oversight and accountability mechanisms across carbon-crediting programs.

8.10 The ICVCM and carbon-crediting programs should create greater transparency on validation and verification evaluations and outcomes.

The following actions would support effective implementation of this recommendation:

- The ICVCM should require carbon-crediting programs to implement rules specifying that every validation or verification engagement concludes with a formal outcome within a defined timeframe (e.g. one year).
 - A harmonised taxonomy for engagement status (e.g. initiated, active, suspended, concluded with an opinion) would improve consistency and transparency across programs.
- Time-bound requirements should also apply to carbon-crediting program-level reviews and approvals.
- Carbon-crediting programs should set clear expectations for how quickly project developers must respond to VVB findings (e.g. within 60–90 days) and for steps for escalation if deadlines are missed by project developers.

- The ICVCM should require carbon-crediting programs to provide the data to create a centralised database that tracks project status, including rejections, cancellations and negative opinions, across carbon-crediting programs.
- Carbon-crediting programs should require VVBs to report data on their own activities, such as quantity of all validations and verifications undertaken by scope, in standardised formats and share this information with accreditation bodies for evaluation and consideration during surveillance activities.
- Carbon-crediting programs should establish rules preventing projects from changing VVBs while unresolved findings from the original audit remain open.
- The ICVCM should develop a transfer protocol to ensure accountability and consistency when switching VVBs during the course of an audit and minimum steps to do so, to prevent project developers from switching VVBs to evade unresolved findings.
- The ICVCM should require carbon-crediting programs to establish transparent guidelines and explicit conditions for use of desk-based audits to improve clarity and oversight.
- Carbon-crediting programs should enforce strict controls to ensure uploaded reports match finalised versions, regardless of whether the project proponent or VVB uploads them.
 - Enhanced digitalisation of the overall project registration and MRV processes may also address these concerns. Therefore, this recommendation should be brought for discussion to the CIWP on Digital MRV.

Participants highlighted that greater transparency around validation and verification engagements and outcomes would improve accountability, reduce delays and strengthen confidence in the assurance system. Clear, time-bound requirements were seen as particularly important to prevent engagements from remaining open indefinitely and to provide predictability for VVBs, carbon-crediting programs and project developers.

Defined timelines for validation, verification and program-level review processes are already applied in some mechanisms and regulated sectors, demonstrating that structured deadlines are workable. Applying similar expectations consistently across the validation, verification and approval lifecycle could help reduce bottlenecks, particularly where delays occur after VVB reports are submitted or due to prolonged responses from project developers.

Inconsistent treatment of engagement status and audit outcomes was identified as a source of ambiguity across programs. Harmonised engagement-status categories and clearer definitions of outcomes, including negative opinions, disclaimers or dormant cases, would improve comparability and accountability.

More systematic tracking of project status and VVB activity data across programs would further strengthen oversight. Standardised reporting formats, improved digital systems and data-sharing with accreditation bodies were identified as ways to support surveillance activities and reduce the risk of problematic projects re-entering the market under different identities. These measures are complementary to ongoing efforts to improve digital MRV systems and overall market transparency.

Preventing projects from changing VVBs while unresolved findings remain open was identified as an important safeguard to avoid ‘opinion shopping’.

During discussions, participants observed that carbon-crediting programs could digitalise and adopt harmonised templates and forms for validation of outcomes, project status, checklists and performance metrics to reduce duplication and improve comparability.

Though this was not advanced as a recommendation, the following actions and considerations were raised:

- The ICVCM could have a role in including elements of this recommendation as a requirement for CCP-Eligible carbon-crediting programs.
- The ICVCM would need to consider how tools (including AI tools) fit into future oversight frameworks, as they may meaningfully improve efficiency and should be acknowledged in guidance or recommendations.
- This observation should be brought for discussion to the CIWP on Digital MRV.

Participants identified fragmented reporting practices and inconsistent use of templates as a source of inefficiency and reduced comparability across carbon-crediting programs. Differences in how validation outcomes, project status, checklists and performance metrics are documented can create supervision gaps and increase administrative burden for VVBs, programs, accreditation bodies and other interested stakeholders.

Greater digitalisation and harmonisation of core templates and data fields were viewed as ways to streamline processes, reduce duplication and improve consistency while still respecting existing requirements for validation and verification reports and opinions. Clear, harmonised expectations regarding the level of detail required in assessments were seen as more important than rigidly standardised formats.

Participants also noted that efficiency gains in validation and verification are increasingly likely to come from digital tools, including emerging AI-supported applications that can assist with desk-based reviews and structured checks. While such tools do not replace professional judgment, they may allow auditors and reviewers to focus on substantive issues, including site visits and analytical review. As these tools evolve, their role in oversight frameworks was identified as a relevant consideration for ongoing work under the CIWP on Digital MRV.



Participants

The CIWP on Oversight of VVBs was comprised of experts from:

- American National Standards Institute (ANSI) National Accreditation Board (ANAB)
- Carbon Check
- SCS Global Services
- Climate Law and Policy
- High Tide Foundation
- United Nations Environmental Programme
- Verra
- International Association of Validation and Verification Bodies (IAVVB)
- Atmosphere Alternative
- Earthood
- Wildlife Works
- Asociación Española de Normalización y Certificación (AENOR)
- The Gold Standard Foundation
- Climate Impact Initiative Uganda
- Perspectives Climate Group
- SustainCert
- Isometric
- EcoSecurities
- Fair Climate Fund
- Carbon Check

Annexes

Annexes

Annex 1: Table of recommendations

Recommendation type	Relevant Assessment Framework criteria	No.	Recommendation	Elements
Recommendations for CCP Assessment Framework refinement	4.1	8.1	The ICVCM should establish minimum reporting and transparency requirements for CCP-Eligible programs related to VVB performance.	The following actions would support effective implementation of this recommendation: a. These requirements could be introduced through a phased approach, beginning as guidance or best practice recommendations, then evolving into formal requirements once tested and refined. b. Key reported information would be made publicly available in a constructive, non-punitive manner, avoiding 'name and shame' approaches. However, actors who cross a clearly defined line into fraud should not be protected by confidentiality provisions. c. A standard reporting template should be developed to ensure comparability across carbon-crediting programs, setting out common categories of information to be reported on VVB performance (for example, program oversight activities, patterns in non-conformities, timelines for issue resolution, use of witness audits and referrals to accreditation bodies, where relevant).
Further recommendations		8.2	Carbon-crediting programs should define a tiered rectification framework for VVBs. It could range from corrective action plans for minor mistakes all the way to suspension for major, material mistakes, and in cases of severe over-issuance unrelated to calculation methods set out in the methodology, assigning proportionate responsibility to VVBs, including obligations for restitution or restatement of validation and verification outcomes and undertaking corrective audit work where needed.	The following actions would support effective implementation of this recommendation: a. The ICVCM should set minimum requirements for VVB rectification applicable across carbon-crediting programs. b. Carbon-crediting programs should track cases where significant discrepancies are found between VVB-submitted verification requests and credits deemed eligible during program review.

Annex 1 Table of recommendations (Cont.)

Recommendation type	Relevant Assessment Framework criteria	No.	Recommendation	Elements
Recommendations for CCP Assessment Framework refinement	4.1	8.3	The ICVCM should develop a harmonised definition of the boundaries of VVBs' responsibilities, particularly regarding due diligence of mitigation activities and legal compliance by project participants (e.g. human rights, anti-money laundering).	The following actions would support effective implementation of this recommendation: a. The ICVCM should conduct a mapping exercise of carbon-crediting program screening practices, audit assurance activities and accreditation body enforcement, focusing on legal and compliance areas. Based on this mapping, the ICVCM should develop a list of minimum expected checks by different actors, clarifying and harmonising responsibility boundaries without reducing existing carbon-crediting program criteria. b. The ICVCM should propose guidelines for VVBs on when and how to report suspected illegal or unethical activities, both within and beyond their audit scope. c. The ICVCM should coordinate improved communication and outreach to clarify the role and value of VVBs to market stakeholders, highlighting their strengths and contributions to integrity.
Recommendations for CCP Assessment Framework refinement	4.1	8.4	The ICVCM should clarify expectations for VVBs to possess and apply multidimensional competencies (spanning GHG assessment, environmental and social safeguards, SDG impact assessment, financial review for additionality) so that validation and verification activities reliably assess the full spectrum of project performance and risks.	The following actions would support effective implementation of this recommendation: a. Carbon-crediting programs should align their VVB eligibility and audit requirements to broaden the scope of VVB competence requirements to consistently include social and environmental safeguards and SDG impacts, supported by harmonised requirements for these competencies in VVBs' audit teams and the audit scope, that could be adopted across carbon-crediting programs. b. A competency matrix for VVBs should be developed by a multi-stakeholder effort led by the ICVCM. c. Carbon-crediting programs should require VVBs to ensure that diverse competencies (GHG quantification, social and environmental safeguards, local knowledge and legal awareness) are included in the audit team. Competency requirements should apply to carbon-crediting program staff as well, who conduct final reviews of VVBs' work prior to project registration or issuance.
Further recommendations		8.5	VVBs should focus on expanding and upskilling the pool of qualified auditors. Accreditation bodies and carbon-crediting programs should strengthen the competencies of their reviewers as well, to cover all the evaluated areas.	The following actions would support effective implementation of this recommendation: a. International standards bodies, in collaboration with carbon-crediting programs and relevant market actors, should develop and establish credentialing systems and global auditor databases for VVBs and individual qualified auditors to ensure appropriate expertise is identified and applied to validation and verification activities. • A catalogue of accepted training routes could promote portability of competence evidence across programs. b. The ICVCM should coordinate with ISO, Global Accreditation Cooperation Incorporated (Global ACI) and relevant market actors for the establishment of a harmonised training platform and formal recognition mechanisms for auditor competences.

Annex 1 Table of recommendations (Cont.)

Recommendation type	Relevant Assessment Framework criteria	No.	Recommendation	Elements
Further recommendations		8.6	To support consistent, credible evaluation practices of SDG- and safeguard-related reporting and avoid duplication, CCP-Eligible programs should evaluate international standards (e.g. FSC, Rainforest Alliance, A6.4 SD Tool) with the objective of recognising equivalency for mitigation activity reporting and evaluation of these topics.	The following actions would support effective implementation of this recommendation: a. Where possible, recognised equivalent standards should be referenced instead of creating new frameworks. b. A technical group, which could be convened by the ICVCM or a different actor and include CCP-Eligible programs, accreditation bodies and subject matter experts, should assess which standards have equivalence. • Procedures should be defined to ensure that carbon-crediting programs can consistently rely on recognised equivalent standards, including through measures such as document review, sampling or secondary checks. • Programs must retain the final authority to determine when and how equivalency applies, even within a harmonised framework.
Recommendations for CCP Assessment Framework refinement	4.1	8.7	The ICVCM should require carbon-crediting programs to implement a risk-based oversight system of VVBs that does not overlap with accreditation bodies' oversight of VVBs and does include, at a minimum, program-specific approval processes, project-level reviews, site visits, witness audits, non-conformance tracking and checks on real-world conditions.	The following actions would support effective implementation of this recommendation: a. The ICVCM should engage accreditation bodies directly and encourage alignment of rules on oversight of VVBs across carbon-crediting programs through Global ACI structures. • Carbon-crediting programs and accreditation bodies should tailor their respective oversight activities to avoid overlap and strengthen overall oversight. b. The ICVCM should require that CCP-Eligible carbon-crediting programs establish and maintain a coordinated, structured feedback and information-sharing system with accreditation bodies. • The minimum set of information to be shared with accreditation bodies should include VVB activity levels (including contracted projects), trends in non-conformities, significant incidents and program-level guidance. • CCP-Eligible programs should recognise and address practical and logistical constraints affecting accreditation bodies' ability to oversee VVBs effectively, including constraints related to delayed or short-notice information sharing (for example, around VVB site visits). c. Accreditation bodies should consider additional oversight methods beyond current approaches, where witness assessments are not delivering full project assessment insights.

Annex 1 Table of recommendations (Cont.)

Recommendation type	Relevant Assessment Framework criteria	No.	Recommendation	Elements
Further recommendations		8.8	A multi-stakeholder initiative led by the ICVCM should develop a standardised risk matrix taxonomy for validation and verification activities that combines country-level and project-type risk to guide audit depth and focus.	The following actions would support effective implementation of this recommendation: a. Audit requirements should be defined objectively and based on risk, with harmonisation of risk identification and drivers across programs, countries, project types and the level of social and environmental safeguards risk associated with the activity. b. The standardised risk matrix should start with minimum requirements and be updated periodically, as risk information may change over time. c. Carbon-crediting programs should establish guidelines or project-specific expectations for the level of professional effort required, such as indicative ranges of auditor days or other effort metrics, to help deter underpaying, understaffing or using insufficient time from qualified personnel that can undermine quality in practice.
Further recommendations		8.9	Carbon-crediting programs should strengthen requirements for impartiality and avoiding conflicts of interest in VVBs' services.	The following actions would support effective implementation of this recommendation: a. The ICVCM should require carbon-crediting programs to implement a prohibition, either absolute or clearly defined, on consulting–audit combinations for the same client across all carbon-crediting programs, including via affiliate companies, and prohibit corporate/contractual linkages when these compromise independence. Risk analysis must be applied to scrutinise and restrict problematic relationships and document why residual risks are acceptable. b. The ICVCM should require carbon-crediting programs to explicitly codify and define perceived impartiality with mandatory screening for relationship risks (e.g. prior engagements, family or business ties) and clear thresholds where activity must be declined if perceived risks cannot be reduced to an acceptable level. c. The ICVCM should require carbon-crediting programs to require that VVBs generate frontloaded invoicing (e.g. significant pre-outcome payments) to reduce outcome-linked incentives. d. Carbon-crediting programs should publish guidance on acceptable fee structures and require VVB declarations that no compensation element is contingent on a positive statement. e. With the ICVCM stewardship, carbon-crediting programs should develop a centralised, cross-program mechanism for conflict of interest definition, declaration, information sharing and coordinated sanctions so that VVB issues identified by one program trigger system-wide visibility and action. There should be coordination with accreditation bodies to avoid oversight silos. f. The ICVCM should include guidance or requirements for VVBs relating to one-time or rotation-based models (caps on consecutive audits per activity/developer/owner) and require enhanced impartiality checks where repeated engagements are unavoidable. • The ICVCM should expand rotation requirements to cover not only VVBs but also the individual auditors assigned to an activity.

Annex 1 Table of recommendations (Cont.)

Recommendation type	Relevant Assessment Framework criteria	No.	Recommendation	Elements
Recommendations for CCP Assessment Framework refinement	3.1	8.10	The ICVCM and carbon-crediting programs should create greater transparency on validation and verification evaluations and outcomes.	The following actions would support effective implementation of this recommendation: - The ICVCM should require carbon-crediting programs to implement rules specifying that every validation or verification engagement concludes with a formal outcome within a defined timeframe (e.g. one year). - A harmonised taxonomy for engagement status (e.g. initiated, active, suspended, concluded with an opinion) would improve consistency and transparency across programs. - Time-bound requirements should also apply to carbon-crediting program-level reviews and approvals. - Carbon-crediting programs should set clear expectations for how quickly project developers must respond to VVB findings (e.g. within 60–90 days) and for steps for escalation if deadlines are missed by project developers. - The ICVCM should require carbon-crediting programs to provide the data to create a centralised database that tracks project status, including rejections, cancellations and negative opinions, across carbon-crediting programs. - Carbon-crediting programs should require VVBs to report data on their own activities, such as quantity of all validations and verifications undertaken by scope, in standardised formats and share this information with accreditation bodies for evaluation and consideration during surveillance activities. - Carbon-crediting programs should establish rules preventing projects from changing VVBs while unresolved findings from the original audit remain open. - The ICVCM should develop a transfer protocol to ensure accountability and consistency when switching VVBs during the course of an audit and minimum steps to do so, to prevent project developers from switching VVBs to evade unresolved findings. - The ICVCM should require carbon-crediting programs to establish transparent guidelines and explicit conditions for use of desk-based audits to improve clarity and oversight. - Carbon-crediting programs should enforce strict controls to ensure uploaded reports match finalised versions, regardless of whether the project proponent or VVB uploads them. - Enhanced digitalisation of the overall project registration and MRV processes may also address these concerns. Therefore, this recommendation should be brought for discussion to the CIWP on Digital MRV.

Annex 2. Existing oversight mechanisms of VVBs

DISCLAIMER: The annex below was prepared prior to the convening of the working group in September 2025. The information presented may not reflect subsequent developments.

Under Criterion 4.1 of the ICVCM Assessment Framework, carbon-crediting programs must apply robust and independent validation and verification processes, exceeding baseline CORSIA expectations. The criterion mainly refers to accreditation and VVB performance assessment, both of which are detailed below.

Accreditation process

The accreditation of VVBs follows the process defined in ISO/IEC 17011:2017, Chapter 7, which outlines the structured steps to evaluate and recognise a VVB's competence. Accreditation ensures that a VVB is capable of delivering validation and verification services in line with defined sectoral and program-specific requirements. The process does not evaluate project outcomes but instead focuses on the VVB's ability to implement the required systems, procedures and competencies.

Step 1: Application

The VVB submits a formal application to an accreditation body, specifying:

- The scope of accreditation, including technical sectors (e.g. energy, forestry) and applicable programs (e.g. CDM, PACM, ISO 14065-based programs)
- Supporting documentation, such as its quality management system (QMS), organisational structure and procedures

Step 2: Application Review

The accreditation body conducts a preliminary review to ensure the application is complete and that the VVB is eligible for accreditation. Any missing or unclear elements are clarified before proceeding.

Step 3: Assessment Preparation

An assessment plan is developed, including:

- Assignment of a qualified assessment team
- Definition of sites to be visited
- Selection of witness audits or project files to review

This phase also includes risk analysis and identification of key areas requiring in-depth evaluation.

Step 4: Initial Assessment

This is the core of the accreditation process and includes:

- Office assessment: Evaluation of the VVB's QMS, impartiality framework, competence management, documentation and internal procedures
- Witness audit(s): Observation of the VVB conducting real validation or verification work to assess the implementation of its procedures and auditor competence
- Project file review: Examination of documentation from one to two completed or ongoing projects to verify application of standards and methodology

Step 5: Assessment Reporting

The assessment team compiles a report summarising its findings. If non-conformities are identified, the VVB must submit corrective actions within a defined timeframe. Evidence of corrective action implementation is reviewed before proceeding.

Step 6: Decision-Making

A separate committee or decision-maker within the accreditation body, different from those who carried out the assessment, reviews the assessment findings and takes the decision on accreditation. This seeks to ensure that the final decision is based solely on objective evidence.

Step 7: Accreditation Outcome

If successful, the VVB is granted accreditation for the defined scope. The accreditation certificate specifies:

- The technical areas/sectors approved
- The standards and schemes under which the VVB is authorised to operate

The accreditation is typically valid for a defined period (e.g. 4–5 years), subject to ongoing surveillance and reassessment.

This structured process aims to ensure that only competent and impartial organisations are accredited as VVBs. It also provides a transparent and standardised foundation for trust in validation and verification across all recognised carbon-crediting schemes.

Annex 2 Existing oversight mechanisms of VVBs (Cont.)

The table below outlines the accreditation requirements and oversight mechanisms that CCP-Eligible programs⁹ incorporate in their provisions for working with VVBs and evaluating performance.

CCP-Eligible program	Accreditation requirements for VVBs	Oversight mechanisms
ACR	Accredited to ISO 14065:2013 (or latest version) in the applicable sectoral scope by an IAF member with a Memorandum of Understanding (MoU) with ACR.	- Corrective actions can be implemented by ACR if performance issues are identified, including notifying the accreditation body. - ACR may suspend or revoke a VVB's participation in the program if performance issues persist. - Regular review of project and validation/verification activities and documents. - Documents may be accepted, returned for corrections/clarifications or rejected. - VVBs and project proponents must resubmit corrected documents for further review. - ACR conducts its own oversight during VVB performance, supplementing accreditation body audits. - ACR can suspend or revoke VVB approval with cause. - Significant or recurring issues are reported to the accreditation body. - Complaints about VVBs can be submitted to ACR. - These are handled through distinct resolution processes depending on the nature of the complaint.
Architecture for REDD+ Transaction TREES (ART)	Accredited to ISO 14065 with ART included in the scope by an IAF member with an MoU with ART.	- Conducts completeness checks on validation and verification reports and documentation. - Ensures VVBs comply with TREES and TREES VVS requirements. - Reviews finding resolutions to ensure correct interpretation and consistency across VVBs. - May lead to: - New or updated guidance documents. - Additional VVB training. - Identification of performance issues. - Potential issues can be reported via the public comment email on the ART website. - If a VVB performance issue is detected, action will be taken based on its severity. - High severity is reported to the IAF accreditation body and the VVB cannot issue new opinions or start new activity until resolved. - Medium severity requires VVBs to submit a corrective plan with a timeline, approved by ART, and if unresolved it is escalated to high severity. - Low severity cases require corrections, including encouragement for VVBs to review and improve internal processes.
Climate Action Reserve (CAR)	Accredited to ISO 14065 and ISO 14064. ISO 14066 is required as part of ISO 14065. Accreditation provided by ANSI and EMA (for Mexico).	- Reviews all verification documentation for every project verification period submitted for credit issuance. - Each protocol (methodology) has a review checklist. - Reviews are conducted independently by a lead reviewer and an approving manager, trained in the specific project type. - Clarifications are sent to the VVB (and project developer if needed); credits are only issued once all issues are resolved. - Monthly review of all requests for verifier clarification. - Significant issues are flagged and escalated to Associate Director of Programs or Director of Latin America, depending on project type and jurisdiction. - Outcomes may include: - Informal notices (emails outlining expectations). - Formal actions (warning letters, notifications to accreditation bodies or corrective action requests). - Conducts site visit oversight.

⁹ Eligible as of September 2025, oversight mechanisms cited as of the same date. All information collated from open sources.

Annex 2 Existing oversight mechanisms of VVBs (Cont.)

CCP-Eligible program	Accreditation requirements for VVBs	Oversight mechanisms
[cont.] Climate Action Reserve (CAR)	[cont.] Accredited to ISO 14065 and ISO 14064. ISO 14066 is required as part of ISO 14065. Accreditation provided by ANSI and EMA (for Mexico).	[cont.] - Oversight is triggered for: - New VVBs: full oversight on their first project. - New sectors/project types: when VVBs operate in unfamiliar areas. - Red flags or warnings: performance concerns may face random oversight or desktop audits. - New lead verifier/senior internal reviewer: when assigned to new sectors/project types. - May issue warnings, corrective action requests or suspensions at its discretion. - Escalation process: - Second occurrence of the same issue: VVB is asked to process CAR's complaint through their corrective action system. - Third occurrence: formal warning letter issued; further actions may include suspension or revocation of approval. - Accreditation body is notified of any issue and copied on all formal notifications.
ERS – Ecosystem Restoration Standard	Holds valid accreditations for ISO 14064-3 and ISO 14065.	- Systematic reviews of validation and verification activities and reports. - Evaluates VVBs on: - Alignment with procedures. - Effectiveness in assessing project compliance with ERS requirements. - Overall competency in conducting and reporting validation/verification activities. - Evaluations are performed: - After the first validation/verification. - At least biennially. - ERS may also evaluate VVBs: - Upon receiving concerns, notifications or complaints. - At its own discretion. - Poor performance is reported to the relevant accreditation body. - ERS has provisions to suspend or revoke a VVB's participation in the program.
Gold Standard (GS)	Accepted accreditation programs include: - ISO 14065 under the ANSI-GS Accreditation Program - UNFCCC-CDM Accreditation (AIE or DOE status) - ASI – FSC Certification Body status.	- Systematic review of all VVB reports submitted for certification through independent experts and internally, resulting in: - Findings for the specific audit; - Scoring of the VVB performance; - Structured quarterly feedback to VVB managers; - Calibration trainings for auditors on common issues identified during reviews; and - Standard clarifications and updates where necessary. - Global stakeholder consultation for each audit report, and transparent publication of all audit documentation. - VVB approval by an independent Technical Advisory Committee, based on extensive secretariat review, covering: - Legal status, financial stability, and liability. - Recognised accreditation for specific scopes. - HR, structure and competence management for each of the approved scopes. - Quality management system. - Governance. - Independence and impartiality. - Validation and verification process and requirements. - Re-approval every 3 years, covering the same requirements. - Continuous monitoring of accreditation status and NCs.

Annex 2 Existing oversight mechanisms of VVBs (Cont.)

CCP-Eligible program	Accreditation requirements for VVBs	Oversight mechanisms
[cont.] Gold Standard (GS)	[cont.] Accepted accreditation programs include: - ISO 14065 under the ANSI-GS Accreditation Program - UNFCCC-CDM Accreditation (AIE or DOE status) - ASI – FSC Certification Body status.	[cont.] • GS-approved auditor requirements for each audit team and approval scope: - Examination requirements. - Training requirements. - Other competence requirements. • Continuous monitoring of team capacity and competence, including: - Competence framework data updates. - GS4GG quarterly update trainings. - Calibration trainings. - Face-to-face trainings. - Special topic trainings. • In-depth monitoring of the first 5 engagements of a VVB. • Persistent or serious unresolved performance issues of a GS-approved VVB or auditor may lead to: - Modification; - Suspension; or - Revocation of approval.
Isometric	Accredited by an IAF member to ISO 14065 or other relevant ISO standards (e.g. ISO 14034, ISO 17020, ISO 17029) or by a relevant governmental or intergovernmental body. Must provide evidence of greenhouse gas (GHG) accounting experience and sectoral expertise per IAF MD 14.	• Isometric may conduct oversight during the validation and/or verification process. • Oversight activities may include review of: - VVB documentation (e.g. verification and sampling plans, reports, opinions). - Conflict of interest disclosures. - Project proponent documentation.
Verified Carbon Standard (VCS) by Verra	Signed an agreement with Verra, and is accredited by an IAF member recognised under the IAF Multilateral Recognition Arrangement (MLA) for ISO 17029 and/or 14065, or accredited under a VCS-approved GHG program.	• Desk reviews of VVB work. • Office visits to VVBs. • Witnessing audits, both in person and remotely. • Reviewing work products developed during audits. • Verra provides feedback and requires VVBs to address non-conformities. • Performance issues are reported to the respective accreditation body. • Verra has the sole discretion to apply sanctions based on oversight findings. • Sanctions vary by severity and may include: - Warnings - Suspensions - Revocation of approval • Sanctions are governed by the VVB agreement signed with Verra. • Verra may share non-conformity reports with accreditation bodies.

Annex 2 Existing oversight mechanisms of VVBs (Cont.)

CCP-Eligible program	Accreditation requirements for VVBs	Oversight mechanisms
Puro.earth	Accreditation from: IAF member according to ISO 14065 or ISO 14066 or other relevant ISO standard; United Nations UNFCCC CDM Executive Board according to the CDM Accreditation Standard for DOE, or by a new relevant accreditation system under the UNFCCC; National or international emission allowance/reduction program; or Other relevant accreditation system.	• Witness audits of all VVBs every five years. • Witness audits may be conducted internally by the accredited VVB, with oversight by the VVB's accreditation body. • Puro.earth reserves the right to attend audits. • Verification and validation audit reports undergo a quality check by Puro.earth before CO2 Removal Certificates (CORCs) are issued. • Quality check records must be retained in the project file for all projects. • Reports with deficiencies are returned to the auditor for correction and/or clarification. • CORCs are not issued until the report quality is satisfactory. • Repeat quality issues trigger suspension or revocation of the Lead Auditor or VVB from the approved auditor list. • Suspension or revocation decisions are at Puro.earth's sole discretion. • Revocation may not be permanent. • Decisions to suspend or revoke a Lead Auditor may be appealed.



THE INTEGRITY COUNCIL
FOR THE VOLUNTARY CARBON MARKET

The Integrity Council for the Voluntary Carbon Market (ICVCM) is an independent, non-profit governance body for the voluntary carbon market, which aims to ensure the voluntary carbon market accelerates a just transition to 1.5°C. The ICVCM aims to set and maintain a voluntary global threshold standard for quality in the voluntary carbon market. The threshold standard is based on the ICVCM's Core Carbon Principles (CCPs) and is implemented through an Assessment Framework that sets out what high quality means by reference to those principles.



www.icvcm.org



info@icvcm.org



www.linkedin.com/company/icvcm/