



Approval Programme Guide

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1.0 INTRODUCTION

The ICROA Approval programme (the Programme) has been recognised since 2008 as the industry standard for voluntary carbon market (VCM) services providers¹ (Organisations) promoting greenhouse gas (GHG) emission reductions, removals, and use of carbon credits to the highest standards of environmental integrity, in support of the Paris Agreement goals.

The purpose of this document is to outline the Programme's purpose, structure, and the processes for obtaining the ICROA Approval Label (the Label). This includes information on who is eligible to apply, Programme timelines, and the procedures in place to become an Approved Organisation. This document also outlines how the Label may be used, penalties for non-compliance, and the complaints and appeals procedure.

This Programme Guide is one part in a series of documents used to define the Programme. Readers should view this document in conjunction with the following:

- Code of Best Practice (the Code)
- Terms & Conditions
- Application Form
- Audit Form
- Fee schedule

1.1 Approval Description

ICROA Approval:

- a. is recognition by ICROA that a voluntary carbon management service organisation (VCM organisation) competently adheres to the Code
- b. enables the use of the ICROA Approval Label (in accordance with the requirements of the ICROA Approval Terms and Conditions);
- c. is achieved and maintained through satisfactory completion of:
 - i. the ICROA Application process (including confirmation that a VCM organisation meets the Eligibility Criteria); and
 - ii. an annual compliance audit performed by third-party specialists;
- d. is maintained through ongoing compliance with the ICROA Approval Terms and Conditions and satisfactory completion of an annual compliance audit;
- e. is granted on a non-reliance basis and neither IETA nor ICROA accept any liability for decisions made by third parties that considers or attributes value to the existence of an ICROA Approval; and
- f. does not amount to any form of endorsement other than to approve that the VCM organisation has satisfactorily completed the annual compliance audit against the Code, nor does it:
 - i. give rise to a representation or endorsement to any third party of the VCM organisation;

¹ Typically includes project developers, carbon credits retailers and consultants providing carbon management and compensation services.

- ii. equate to any endorsement, accreditation, or verification by or on behalf of IETA; or
- iii. confirm, accredit or verify any particular business activity, project or service offering of a VCM organisation.

2.0 ROLES & RESPONSIBILITIES

This section describes the different groups involved in the Programme and their responsibilities.

2.1 IETA Secretariat

The IETA Secretariat (the Secretariat) is responsible for managing the Programme and ensuring its effective operation, including appointing and overseeing the third party Auditor. The Secretariat is available to answer questions from Applicants and Approved Organisations, as well as to clarify questions from the Auditor. The Secretariat connects applicants with the appropriate resources and maintains all Programme documentation and records. Disputes, complaints, and appeals are managed by the Secretariat, in accordance with the Approval Terms and Conditions.

2.2 ICROA Governance Committee

The ICROA Governance Committee (IGC) is the elected governance body of the ICROA Approval Programme (the Programme). The role of the IGC is to inform the strategy of ICROA, support the effective application of the Programme, and represent the collective views of ICROA Approved Organisations. The IGC helps ensure that the Programme adheres to the Approval Terms and Conditions.

2.3 Independent Advisory Committee

The Independent Advisory Committee (IAC) is a group of voluntary carbon market experts appointed by the IGC. The IAC is responsible for annually reviewing the Code and Programme and presenting recommendations for improvement to the Secretariat. The IAC plays an important role in advising the Secretariat on best practices and improvements to the Programme.

2.4 VCM Organisation (Applicant)

An Applicant is the VCM organisation applying to the Programme. An Applicant becomes an Approved Organisation upon successful completion of the first compliance audit. The Applicant is therefore responsible for presenting information to demonstrate alignment with the Code in the form of controls, procedures, data, and documentation that show the organisation conducts operations to a high degree of integrity. The Applicant is responsible for completing the annual compliance audit in a timely manner and ensuring their ongoing compliance with the Code.

2.5 ICROA Approved Organisation

An Approved Organisation is responsible for maintaining compliance with the Code, following the guidelines outlined for appropriate use of the Label, and undergoing an annual compliance audit. The Approved Organisation is responsible for reporting relevant information that is complete and accurate.

2.6 Auditor

The Auditor is an independent third-party specialist responsible for assessing the Applicants' and Approved Organisations' information according to the prescribed audit activities in the Code in

order to provide an independent opinion as to whether or not the organisation conforms with the Code. The Auditor assesses compliance and grants Approval. The Auditor applies commonly accepted audit practices at a review level for documentation and assessment. The Auditor may make recommendations for improving the Code or Programme to the Secretariat.

3.0 PROGRAMME ELIGIBILITY

Applicants must meet all of the following criteria to be eligible to apply to the Programme:

1. The Organisation is committed to reducing its own GHG emissions and striving for a science-aligned reduction pathway aligned to the Paris Agreement goals.
2. The Organisation has been in the business of transacting or retiring carbon credits for voluntary purposes for at least one full year.
3. *The Organisation actively sells a service to retire ICROA-Endorsed carbon credits on behalf of corporates and/or individuals, for the purpose of voluntarily compensating for their GHG emissions.
4. The Organisation is committed to achieving large absolute emission reductions across its client base and promoting alignment to the Paris Agreement goals.
5. *The minimum volume sold or retired annually by the organisation must be at least 10,000 tonnes of CO₂e.
6. *The Organisation's minimum annual financial turnover must be \$100,000 or the local currency equivalent.
7. The Organisation must disclose to the ICROA Secretariat any pending or ongoing litigation involving a member of IETA or another market participant.
8. In applying to become Approved, the Organisation agrees to undergo an annual compliance audit by a third-party independent Auditor to demonstrate compliance with the Code. The Organisation accepts that the final determination of the third-party auditor is binding.
9. The Organisation agrees to, and signs, the Terms and Conditions of the Programme.

If an organisation does not meet the requirements of the criteria marked with an "" above, they may refer to Appendix 2 of the Code of Best Practice for more information on Conditional Approval.*

Additionally, VCM organisations must attest to the following in the Application Form:

VCM organisations commit to actively advancing the following Principles:

- That corporates measure and publicly report their organisation's GHG emissions, including Scope 1, 2, and 3, following a recognised standard that is relevant to the intended use (i.e., ISO, Greenhouse Gas Protocol).
- That corporates strive to abate their GHG emissions in line with climate science to achieve net-zero by 2050 or sooner. The roadmap should include interim short- and medium-term targets that ensure action now and along the way.
- That progress towards these targets is monitored and publicly reported on an annual basis.

Applicants and Approved Organisations are NOT required to be IETA members. Non-IETA applicants may apply for Approval by following a similar process to IETA members. These Applicants will undergo a due diligence check by the Secretariat to ensure the company is real, operating in carbon markets, and does not pose a reputational risk to IETA if Approved by the Programme. Non-IETA Approved Organisations will have access to the ICROA Annual General Meeting and will be included on communications specific to the Programme. Non-IETA Approved Organisations will not have access to IETA member-only benefits such as access to IETA working groups, or discounted access to conferences and summits.

4.0 APPLICATION & AUDIT PROCESS [see Appendix 1 for a visual representation]

This section describes the different pathways by which Applicants and Approved Organisations complete the application and audit processes. Non-IETA members applying to the Programme undergo additional steps as outlined in Section 4.2.

4.1 Applications & Audit Process

Applicants follow the application process if this is their first time applying to the Programme, or if their status as an Approved Organisation has lapsed through either a failed audit or by choice. If an Applicant does not successfully complete their first audit, they may resubmit an application by following this process again. New applications can be submitted at any time; they will be processed in a timely manner depending on the availability of the Auditor.

Approved Organisations that have passed the previous year's audit will follow this process starting at Step 7. Currently-Approved Organisations do not need to re-apply (Steps 1-6) each year unless their status as an Approved Organisation has lapsed.

The following steps outline the full process:

1) Internal Evaluation

- a) The VCM organisation shall review the Code and determine whether the organisation is eligible to apply for the Approval and meets all requirements in the Code. The VCM organisation shall also review the Approval Terms and Conditions to ensure that all clauses therein will not pose a barrier to Approval if the audit is passed.

2) Expression of Interest

- a) Once the VCM organisation is confident that all criteria are met, it shall express interest by emailing the Secretariat's Programme Coordinator, Franco D'Aprile, at daprile@ieta.org or fill out [this form](#).

3) Due Diligence (*Non-IETA members only*)

- a) Non-IETA members will undergo a due diligence process similar to what is undertaken by the IETA Secretariat for new membership to IETA. This includes a questionnaire to understand the type of company, organisational ownership, staff comments, and

potentially reaching out to references. The goal of the due diligence process is to ensure that only high-integrity companies are Approved against the Code.

4) Results of Due Diligence (*Non-IETA members only*)

- a) Once the due diligence process is complete, the Programme Coordinator will inform the non-IETA member VCM organisation in a timely manner. The organisation will then proceed to Step 5, the application.

5) Application

- a) The purpose of the application is for the Auditor to determine whether the Applicant meets the eligibility criteria and can proceed to the compliance audit.
- b) The application fee must be paid in full by the Approved Organisation prior to the start of the Application review. Programme fees are detailed on the website.
- c) Upon receiving the expression of interest, the Programme Coordinator will connect the Applicant with the Auditor. The Secretariat will set the Applicant up with the Application Form on the online audit platform [see sample Application [here](#)]. A timeline for completion will be communicated to the Applicant. Typically, the Applicant is requested to complete the application within 2 weeks of initiation. The Auditor will review the responses in the Application Form and may request clarifications or additional information from the Applicant which must be provided before the Auditor can make a decision on eligibility.

6) Results of Application

- a) Once the application is completed, and all additional information requested by the Auditor has been provided, the Auditor will make a recommendation to the IETA Secretariat as to whether the Applicant can proceed to the audit. This decision will be communicated to the Applicant in a timely manner by the Programme Coordinator.

7) Audit

- a) The purpose of the audit is to determine whether the Applicant or Approved Organisation is in compliance with all requirements in the Code.
- b) The audit and annual fees must be paid in full by the Applicant or Approved Organisation prior to the start of the Audit. Programme fees are detailed on the website.
- c) Upon successful completion of the application, and at a time indicated by the Secretariat, the successful Applicants will undergo the annual audit. A representation of the Audit Form is available on the website, [here](#), so that organisations understand what is required, including examples of evidential documents deemed acceptable by the Auditor. During the audit, the Auditor may request clarifications or additional information which must be provided for the Auditor to make a final decision.
- d) For organisations renewing their Approval:

- i) The annual audit is done in the first half of the year. Before the audit begins, the Secretariat will host a kick-off webinar which should be attended by a minimum of one of the organisation's representatives who will be completing the Audit Form.
- e) For new organisations:
 - i) The annual audit is done on a rolling basis throughout the year. Before the audit begins, the Secretariat may schedule a kick-off call which would be attended by a minimum of one of the organisation's representatives who will be completing the Audit Form.
- f) The organisation's representative(s) should be sufficiently knowledgeable about the organisation's operations to provide clear and detailed responses to all audit questions. The representative(s) should have access to the required information and should be sufficiently dedicated to completing the form in full, and in a timely manner. Timelines and penalties associated with the audit are outlined in Sections 5.0 and 6.0 of this Programme Guide.

8) Results of Audit

- a) Once the Audit Form is reviewed, and all additional information requested by the Auditor has been provided, the Auditor will make a recommendation to the Secretariat as to whether the Applicant meets the requirements of the Code. This decision will be communicated to the Applicant in a timely manner by the Programme Coordinator.

9) Use of Approval Label

- a) Use of the Label occurs upon successful completion of the audit., Rules for use of the Label are outlined in the [Brand Guidelines](#).

10) Audit Completion Certificate

- a) Upon successful completion of the audit, the Approved Organisation will be issued an Audit Completion Certificate and will be provided with a digital copy of the Label. The Approved Organisation's logo will be added to the ICROA website and will be used in marketing materials by IETA to promote and educate others on the Programme.

5.0 TIMELINES

It is important that the audit process is completed in a timely manner. This is a shared responsibility between the Applicant / Approved Organisation, Auditor, and Secretariat.

For organisations renewing their Approval, each year will have one audit cycle, beginning in Q1.

For new organisations, the audit is done on a rolling basis, and they may apply at any time during the year.

The audits will test the organisations' compliance with the Code for the previous calendar year. For example, audits conducted in 2025 will require evidence of compliance to the Code for the organisation's activities in 2024.

Audit timelines are communicated each year in advance of the start date. Approved Organisations will be given a two-week period to notify the Secretariat should the timeline not be achievable. The Secretariat will do all they can to accommodate the Approved Organisation's requirements. Failure to meet the audit timeline will result in penalties in cases where the schedule is not met.

6.0 PENALTIES

Actions by an Approved Organisation that may result in the suspension, restriction, or termination of the organisation's Approval are outlined in the Approval Terms and Conditions. Actions that may result in lesser penalties are described below.

If an Applicant

- fails to complete the Application Form in the timeline prescribed by the Secretariat after the expression of interest, or
- provides inadequate, ineffective, or incomplete responses in the Application Form

they will be issued a written warning, via email, with instructions and timelines to remedy the matter. If the instructions in this written warning are not followed, the Applicant will not be eligible to proceed to the audit until the necessary changes have been made. If the timeline in this written warning is not followed, the application will be closed, and the Applicant will be required to re-submit the Application Form when they are prepared to complete the full process. The re-submission of the Application Form is subject to a new application fee.

If an Applicant or Approved Organisation

- fails to complete the Audit Form in the timeline prescribed by the Secretariat, or
- following a request from the Auditor, provides inadequate, ineffective, or incomplete responses in the Audit Form

they will be issued a written warning, via email, with instructions and a timeline to complete all corrective actions required in the view of the Auditor. Should the corrective action not be implemented / be deemed to be incomplete by the Auditor, the breach will be raised to the IGC who will make the decision to cancel or suspend the audit or give the Applicant or Approved Organisation a final notice to complete all outstanding actions within a set period of time.

If the instructions and timeline in this notice are not followed, the Applicant or Approved Organisation will be required to re-submit the Audit Form and will be subject to a new audit fee. If the Applicant or Approved Organisation fails to complete an audit in the year following the

compliance year,² they will not be eligible for Approval or use of the Label for that compliance year. Failure to complete an audit may result in reputational damage to the Approved Organisation.

All fees and payments, in favour of IETA, are not refundable in part or whole if the application, audit, or Approval is failed, suspended, restricted, or terminated.

Consequences for Missing ICROA Audit Deadlines:

To ensure the integrity and effectiveness of the Approval program, timely completion of audits is crucial. The measures outlined below aim to address additional auditor costs incurred due to delays and ensure accountability among companies participating in the ICROA Approval process who fail to meet the annual third-party audit deadline.

Financial Penalties:

- Organizations missing the ICROA audit deadline due to a lack of responsiveness and/or incomplete information will incur a financial penalty.
- This penalty will cover the unplanned additional work required by the third-party auditor to review the organization's responses and evidence.
- Within 30 days of the audit completion deadline, the penalty will amount to 20% of the ICROA audit fee.

Suspension of ICROA Approval Status:

- If the audit deadline is missed, the organization's logo will be temporarily removed from the ICROA website, until successful completion of the audit.
- Delays beyond 30 days after the audit completion deadline will result in the suspension of the organization's ICROA Approval status.
- During the suspension and until successful completion of the audit, the company cannot claim ICROA Approval, use the ICROA Label, or access any other associated benefits.

Auditor Accountability:

- The third party Auditor will also be held accountable for timely responses and completion of audits to ensure a fair and efficient process.

Interim Deadlines and Proactive Reminders:

To help organizations meet the final deadline, interim deadlines will be established, and proactive reminders will be sent throughout the audit process.

7.0 DISPUTE RESOLUTION

² For example, if an Applicant or Approved Organisation does not complete the audit in 2025 with regards to compliance year 2024, their next opportunity for the audit is 2026. This audit will test compliance with the Code in compliance year 2025, meaning the organisation did not prove compliance with the Code in 2024 and will not be able to claim such, or display the Label, even if successful in passing the audit for the following compliance year.

The Programme's dispute resolution process is outlined in Clause 11 of the Approval Terms and Conditions that must be agreed to by all Applicants and Approved Organisations.

Appendix 1 -Approval Process Diagram

■ Applicant Actions
 ◆ Decisions
 □ Secretariat Actions

