

Carbon Crediting Programme Endorsement Procedure Guide

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1.0 INTRODUCTION

ICROA's Carbon Crediting Programme Endorsement Procedure (the Endorsement Procedure) recognises high-quality carbon crediting programmes (Programmes) in the voluntary carbon market (VCM). The purpose of the Endorsement Procedure is to identify and endorse Programmes for inclusion in the ICROA Code of Best Practice (the Code). The Code exists to provide guidance to ICROA Approved Organisations who provide GHG emissions reduction and carbon crediting services through the use of high-quality carbon credits. ICROA Approved Organisations are only permitted to transact credits from ICROA Endorsed Programmes.

The purpose of this document is to outline the Endorsement Procedure's purpose, structure, and the process a Programme must follow to become endorsed and included in the Code. This document includes information on who is eligible to apply, timelines, and requirements that must be followed.

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

- Carbon Crediting Programme Endorsement Review Criteria ("Endorsement Criteria")
- Carbon Crediting Programme Endorsement Application Form ("Endorsement Application Form")
- Carbon Crediting Programme Endorsement Terms and Conditions ("Endorsement Terms and Conditions")

2.0 ROLES & RESPONSIBILITIES

This section describes the various entities involved in the Endorsement Procedure and their responsibilities.

2.1 ICROA

ICROA is a leading industry Approval Programme committed to enhancing integrity in the voluntary carbon market in support of the Paris Agreement goals. ICROA's mission is to enable climate leadership of corporates and governments by developing and advocating best practices in emissions reductions and carbon crediting usage ahead of and beyond regulation. Based on the ICROA Code of Best Practice, the Approval Programme certifies best practice in GHG emissions reduction and offsetting through the use of high-quality carbon credits as issued by Programmes endorsed through this Procedure.

2.2 IETA Secretariat

The IETA Secretariat (the Secretariat) is responsible for managing the Endorsement Procedure and ensuring its effective operation. This includes appointing, onboarding, and overseeing the third-party Assessor, and ensuring an Assessor does not complete more than two sequential assessments of the same Programme. The Secretariat is also responsible for initiating annual reviews of all published documents related to the Endorsement Procedure. The Secretariat is available to answer questions from Programmes, as well as to clarify questions from the Assessor. The Secretariat assigns a third-party Assessor to the Programme after confirming no conflicts of interest are present or ensures risks are adequately managed



(see section 4.5). The Secretariat maintains all documentation and records of applications and assessments for seven years. Upon completion of the assessment, if the Assessor recommends to endorse, the Secretariat awards endorsement to the Programme. Grievances and appeals are managed by the Secretariat following the dispute resolution procedure outlined in Section 5.0 of this document.

Please note that the Secretariat cannot act as an advisory service to Programmes or be seen in any way to be assisting the Programmes with their application other than addressing procedural questions and clarifying criteria. The interpretation of the third-party Assessor is regarded as the final adjudication on a Programme's endorsement (see section 2.4 below).

2.3 Programmes

Programmes (sometimes called "Standards", and occasionally "Registries,") are the entities applying to be endorsed. A Programme is the independent organisation that lays out the rules and requirements that project developers must follow, ensures independent auditing of those rules, and issues carbon credits which are held in a publicly accessible registry.

A Programme is endorsed and included in the Code upon submitting an Endorsement Application Form, resolving all information requests and corrective actions identified by the Assessor during the assessment, and receiving a positive recommendation from the Assessor. This process is repeated every three years. The Programme is responsible for providing information to demonstrate alignment with the Endorsement Criteria including procedures, evidence of the effective application of procedures, data, and documentation that demonstrates that the organisation conducts operations to a high degree of integrity. The Programme is responsible for completing the application and assessment in a timely manner, as discussed in Section 4.1(7), and ensuring their ongoing compliance with the Endorsement Criteria.

2.4 ICROA Governance Committee

The ICROA Governance Committee (IGC) is the elected governance body of the ICROA Approval Programme. The role of the IGC is to inform the strategy of ICROA, support the effective application of the ICROA Approval Programme, and represent the collective views of the Approved Organisations. The IGC does not make decisions on the endorsement of Programmes. The role of the IGC with regards to the Endorsement Procedure is to review and provide guidance on proposed changes to the Endorsement Procedure Guide, Endorsement Criteria, and Endorsement Application Form. Additionally, the IGC supports the Secretariat in the selection of third-party Assessors.

2.5 Third-Party Assessor

The third-party Assessor (the "Assessor") is an independent, third-party company responsible for assessing the Programmes' compliance with the Endorsement Criteria and providing an independent recommendation for endorsement to the Secretariat. The Assessor applies standard auditing practices and techniques. The Assessor may make recommendations to the Secretariat for improving the Endorsement Criteria. Assessors must meet the following qualifications before they are considered for the Endorsement Procedure.



Company-level qualifications include one or more of the following:

- Accreditation to ISO 17029 Conformity Assessment
- Experience managing initiatives similar to ICROA
- Has no conflict of interest with crediting programmes and testifies as such, or has a clear policy for addressing potential risks (see Appendix 1)
- Other criteria as deemed appropriate by the Secretariat and IGC

Individual-level qualifications for the lead assessor include one or more of the following:

- Minimum 5 years of experience in GHG programme management, project development, or verification
- CV that demonstrates similar experience
- Training to ISO 14065 General Principles and Requirements for Bodies Validating and Verifying Environmental Information
- Training to ISO 14064-2 Specification with guidance at the project level for quantification, monitoring and reporting of greenhouse gas emission reductions or removal enhancements, or ISO 14064-3 Specification with guidance for the verification and validation of greenhouse gas statements
- Has no conflict of interest with any crediting Programmes and testifies as such, or has a clear policy for addressing potential risks (see Appendix 1)
- Other criteria as deemed appropriate by the Secretariat and IGC

To support the independence of the assessments and guard against conflicts of interest, a company is ineligible to be an Assessor if they (or an affiliate) act in the capacity of a project developer, carry out the role of a VVB with crediting programmes, or earn a commission or any form of income from Programmes.

The Assessor is required to attend ongoing training webinar(s) hosted by the Secretariat to ensure that the Endorsement Criteria and spirit of the Endorsement Procedures are understood and to ensure consistency of assessments within and across all Assessors. The Secretariat will complete an annual systematic performance review of all Assessors.

The Assessor may not complete more than two sequential assessments of the same Programme (i.e., initial assessment and first renewal).

3.0 ELIGIBILITY

To be eligible for endorsement, Programmes must meet all measures outlined in the Endorsement Criteria. Programmes may apply for endorsement only after credits have been issued from at least two projects.

The Programme must have a sufficient presence in the market to be fully endorsed. This concretely translates to a minimum of:

- 10 projects registered, <u>and</u>
- 100,000 tCO2e issued.

A Programme may be **Conditionally Endorsed** if it meets all measures in the Endorsement Criteria but not the volume thresholds outlined above. The conditional endorsement will be



noted in the Code and on ICROA's website. While a Programme is Conditionally Endorsed, ICROA Approved Organisations may transact carbon credits from the Programme without restriction. When the Programme reaches both volume thresholds identified above, they are responsible for contacting the Secretariat. The Secretariat will then review the Programme's operations to ensure that the volume criteria are met. If met, the Programme will be fully endorsed and the Code and ICROA website updated accordingly.

There are no additional flexibilities, other than the volume thresholds, that lead to a Conditional Endorsement.

Programmes will not be assessed without having applied for ICROA Endorsement.

4.0 ENDORSEMENT PROCESS

4.1 Endorsement Process

This section outlines the process to apply for endorsement.

Programmes may apply at any time for endorsement. Applications will be processed in the order received and, dependent on the availability of the Assessors. The Secretariat will provide the applicant with an indicative timeline upon receipt of the expression of interest.

The following steps outline the application and endorsement process.

1. Programme Internal Evaluation

The Programme shall review the Endorsement Criteria and determine whether they are eligible to apply for Endorsement. The Programme shall also review the Carbon Crediting Programme Endorsement Terms and Conditions to ensure that all clauses therein will not pose a barrier to endorsement if the application is successful.

2. Expression of interest

The Programme shall express its interest in ICROA Endorsement to the Secretariat via email (<u>daprile@ieta.org</u>). The expression of interest should indicate the Programme's planned submission date. The Secretariat will acknowledge the expression of interest and subsequently plan ahead for the upcoming steps of the Endorsement Procedure, including third-party assessment. The Secretariat will provide an indicative timeline based on the planned submission date and the number of applications undergoing assessment at the time.

3. Submission of Application

The Programme shall submit its application to the Secretariat via email (<u>daprile@ieta.org</u>). The Secretariat will confirm receipt. The application must include a completed Application Form with evidence to support compliance with all criteria.

<u>Programmes should note that their final completed Application Form will be made</u> <u>publicly available on the ICROA website</u>, alongside a summary of the assessment findings, per section 6.0.



4. Completeness Check

All sections of the Application Form must be completed in full. Incomplete applications will not be progressed to the assessment. The Secretariat will check the Application Form for completeness and communicate any outstanding items that must be included before the application can be processed. The Programme's place in the assessment queue will not be confirmed until a complete Application Form is received and confirmed by the Secretariat.

5. Conflict of Interest Check

IETA takes conflicts of interest very seriously and follows a strict process to ensure conflicts are avoided. The Programme and the Assessor must inform the Secretariat if there are any known conflicts, or concern over potential conflicts, due to an existing business relationship between their two organisations.

In the event that a potential conflict of interest is detected between the Programme and the Assessor, the Secretariat will work with the Assessor to put measures in place to alleviate any risk of an assessment being compromised or the perception that an assessment could be compromised.¹

6. Assessment Fee and Invoicing

Prior to beginning the assessment, the Secretariat will invoice the Programme. A fee of EUR 11,000 will be charged for the Assessment which includes a comprehensive review of all programme documents and an endorsement recommendation. This fee is reduced to EUR 7,500 for the Fast Track Renewal Assessment. Additional rounds of reviews, if needed, will be charged on an hourly basis to the Programme. The Secretariat will provide a cost estimate prior to the start of Review #2 or #3 based on the estimated number of hours to conduct the reassessment.

All monies must be paid in full prior to endorsement being granted.

Once proof of payment has been provided by the Programme, the Secretariat will share the application form and supporting documentation with the Assessor. The application will also be made publicly available on the ICROA website.

7. Third-Party Assessment

An assessment comprises up to three rounds of reviews. Each review comprises four key activities: <u>submission</u> by Programme, <u>review</u> by Assessor, <u>clarifications</u> between Programme and Assessor, and <u>report</u> with endorsement recommendation from the Assessor.

¹ The Conflict of Interest Policy developed for the third-party Assessor can be found in "Appendix 1".



A Programme is permitted to be reviewed a maximum of three times. A Programme can reapply if they are not recommended for endorsement after the third review.

The steps below summarise the main actions within the Third-Party Assessment process and Appendix 1 provides a diagram of the process.

Kick-off meeting. The assessment will begin with a kick-off meeting between the Programme and the Assessor. This introductory call is intended to familiarise all parties with one another, the process, and the document-sharing platform that will be used for all communications. The kick-off meeting will be coordinated by the Secretariat.

Review #1. After the kick-off meeting, the Assessor will begin their review of the Programme's compliance with the Endorsement Criteria by reviewing the information provided by the Programme. Within approximately two to three weeks of the kick-off meeting, the Assessor will provide a list of findings² to the Programme, as necessary. The Programme should respond within two weeks and provide all requested information to the Assessor. The Secretariat will coordinate a meeting to clarify the Programme's documentation and responses to the findings if requested by either the Assessor or Programme.

Based on all information provided by the Programme,³ the Assessor will submit a brief assessment report to the Secretariat that includes the following:

- 1. Endorsement recommendation.⁴
- 2. Substantiation for each individual criterion.

3. List of any outstanding findings identifying where certain criteria are not met, and identification of actions that the Programme could take to comply with the Criteria.

The Secretariat will share the assessment report with the Programme. This marks the end of Review #1.

If the Assessor recommends to endorse, the Programme proceeds to step 8. If the Assessor recommends to not endorse, the Secretariat will request a quote from the Assessor on the anticipated cost of a second review, which will also be shared with the Programme. Upon reviewing the report and quoted cost for reassessment, the Programme will notify the Secretariat if they wish to proceed to Review #2. If the Programme opts to proceed to Review #2, they will have 60-days from the date they were sent the assessment report to update and re-submit their Endorsement Application Form and supporting documents to the Secretariat.⁵

² Findings may include information requests or corrective actions

³ The Assessor shall make their recommendations based on the information provided by the Programme in the Endorsement Application Form and any associated documents, as well as publicly available information, as necessary. Letters of support from external stakeholders or other such external documentation from outside parties, will not be considered by the Assessor.

⁴ The Assessor may recommend to endorse, recommend to conditionally endorse (per Section 3.0), or recommend to not endorse.

⁵ Deadline to re-submit will be confirmed by the Secretariat.



Review #2. The Assessor will review the new information provided by the Programme against the Endorsement Criteria. Within approximately two weeks of receipt of the resubmission documents, the Assessor will provide a list of findings to the Programme, as necessary. The Programme should respond within two weeks and provide all requested information to the Assessor. If requested by either the Assessor or Programme, the Secretariat will coordinate a meeting to clarify the Programme's documentation and responses to the findings.

Based on the new information provided by the Programme, the Assessor will update and append their assessment report. The Assessor will provide an endorsement recommendation. The Secretariat will share the report with the Programme. This marks the end of Assessment #2.

If the recommendation is to endorse, the Programme proceeds to step 8. If the Assessor recommends to not endorse, the Programme will have one final opportunity to re-submit their application, at additional cost. The Secretariat will request a quote from the Assessor on the anticipated cost of a third review, which will be shared with the Programme. Upon reviewing the report and quoted cost for reassessment, the Programme will notify the Secretariat if they wish to proceed to Review #3. If the Programme opts to proceed to Review #3, they will have 60-days from the date they were sent the Assessor's report to update and re-submit their Endorsement Application Form and supporting documents to the Secretariat.

Review #3. The Assessor will review the new information provided by the Programme against the Endorsement Criteria. Within approximately two weeks of receipt of the resubmission documents, the Assessor will provide a final list of findings to the Programme, as necessary. The Programme should respond within two weeks and provide all requested information to the Assessor. If requested by either the Assessor or Programme, the Secretariat will coordinate a meeting to clarify the Programme's documentation and responses to the findings.

Based on the new information provided by the Programme, the Assessor will update and append their assessment report with a final endorsement recommendation. This marks the end of Review 3 and the third-party Assessment.

If the final review results in a recommendation to endorse, the Programme proceeds to step 8. If the final assessment results in a recommendation to not endorse, the Programme will not be endorsed and will need to re-apply.

8. Brand Guidelines

Upon receiving a successful endorsement recommendation, the Programme shall sign the ICROA Carbon Crediting Programme Endorsement Terms and Conditions which outlines the rules for use of the endorsement label. They will also be provided with a set of ICROA Brand Guidelines to adhere to. The Terms and Conditions must be signed and returned to the Secretariat prior to the Programme using the label or advertising their endorsement status. The Secretariat will provide the Programme with a letter



stating the status, start date, and other pertinent information related to their endorsement.

9. Inclusion in Code of Best Practice

Upon signing the Terms and Conditions, the Secretariat will update the Code and notify the ICROA membership that the Programme has been endorsed (or conditionally endorsed).

4.2 Renewal Assessment

To ensure the ongoing quality of the ICROA Approval Programme, it is important that endorsed Programmes always adhere to the Endorsement Criteria. To test adherence, the Programmes must undergo a renewal assessment every three years.

Please note, should any concerns about the adherence of a Programme to the Criteria be raised by an Approved Organisation and/or, an IETA member, and/or any member of the public,⁶ the Secretariat reserves the right to request that the Programme undergo an early renewal assessment. Should this occur, the Secretariat will notify the Programme of the reasons for this request. Failure to comply will result in automatic removal of the Programme's Endorsement Status and the Code.

Programmes that have been endorsed for three years will be notified by the Secretariat that a renewal is required and when this will be scheduled. This process follows the same steps as outlined in Section 4.1. The fee for the renewal is the same as outlined in Section 4.1.

If a Programme fails to submit an application in the timeframe specified by the Secretariat, they will be removed from the Code of Best Practice.

4.3 Fast-Track Renewal Assessment

Crediting programmes who are already ICROA Endorsed **and** have been determined to be 'CCP Eligible' by the Integrity Council for the Voluntary Carbon Market (ICVCM), may apply for a Fast Track Renewal with ICROA.

ICROA has identified ICROA Endorsement Criteria that are not assessed or not emphasised in the same manner by ICVCM but remain important to ICROA Approved organisations and therefore must be reassessed as part of a Crediting Programme's Endorsement Renewal. Please refer to the Endorsement Criteria document for the list of selected Criteria to be assessed.

This process follows the same steps as outlined in Section 4.1, only the number of criteria being checked is reduced. Because of this, there is a decrease in the price of Review #1 as outlined in Section 4.1.

In order to be eligible for the Fast-Track Renewal Assessment, the programme applying must have successfully passed a minimum of one category assessment by ICVCM.

⁶ The Secretariat will track all concerns raised.



Please note: ICROA's IGC has validated this initiative for one year starting in November of 2024 and will have to be renewed by this body annually in order to remain active.

5.0 DISPUTE RESOLUTION

As outlined in the Terms and Conditions, the Procedure's dispute resolution process is as follows:

- a) Any dispute between the parties with respect to the Procedure, assessment, or interpretation of any provision of the Terms and Conditions and with respect to the obligations imposed by it on you, as appropriate, shall be resolved as provided for in this clause.
- b) Neither party shall commence formal dispute resolution proceedings (to include litigation), until the earlier of:
 - i. the parties' designated representatives jointly concluding that resolution of the dispute through continued negotiation of the matter does not appear likely; and
 - ii. 60 business days after a party's written request was submitted to the other party and that other party has failed to appoint a designated representative.
- c) Prior to the initiation of any formal dispute resolution proceedings (to include litigation), the parties shall first attempt to resolve their dispute informally, as follows:
 - i. upon the written request of either party to the other, each party shall appoint a designated representative for the purpose of endeavouring to resolve such dispute;
 - ii. the designated representatives shall meet as often as either party reasonably deems necessary in order to gather and provide to the other all information with respect to the matter in issue which the party believes to be appropriate in connection with its resolution. The designated representatives shall discuss the dispute and negotiate with each other in good faith in an effort to resolve the dispute informally;
 - iii. during the course of negotiations, all reasonable requests made by either party to the other for non-privileged information, reasonably related to these Conditions, shall be honoured in order that each of the parties may be fully advised of the other's position; and
 - iv. the method of endeavouring to resolve the dispute shall be left to the discretion of the designated representatives.

6.0 DATA PROTECTION AND CONFIDENTIALITY

The Programmes and ICROA adhere to data protection and confidentiality agreements as per the ICROA Terms and Conditions as published on the ICROA website with the following exceptions that relate to the Programmes:

Further to the Terms and Conditions, by submitting an Application Form the Programme provides consent for the Secretariat to:

a) maintain and archive the contents of the Application Form and any associated documents for up to 7-years;



- b) make the final Endorsement Application Form and associated documents available to the Assessor for the purpose of assessment and evaluation against the Criteria;
- c) publish the final Endorsement Application Form and associated documents on the ICROA website (excluding commercially sensitive information or other information requested by the Programme to be kept confidential);
- d) make publicly available anonymised summaries or reviews of the Programme.



Appendix 1: Conflict of Interest Policy for the Third Party Assessor

This document outlines the Conflict of Interest (CoI) policy for the third party Assessor, engaged in the ICROA Carbon Crediting Programme Endorsement Procedure. The purpose of this policy is to ensure the independence and impartiality of the assessment process in the event that a (CoI), or potential CoI, with an applicant is detected. This policy is intended to be adapted to specific situations as needed.

The following clauses outline the basic framework for addressing Col:

- All members of the Assessor team who are reviewing a carbon crediting programme shall not concurrently engage in any work with or for the carbon crediting programme applying for Endorsement. This includes, but is not limited to, working on, contributing to, or being informed about the content of any contract for this programme.
- Only the Assessor team has access to any materials, resources, or files pertaining to a programme's Endorsement Reviews. This restriction ensures a clear separation between project work and the assessment process.
- The Assessor team shall not be involved in any assignments for carbon crediting programmes for a period of six months following the completion of the review for ICROA Endorsement. This cooling-off period helps to mitigate potential biases and maintain the integrity of the assessment process.
- For a further six months thereafter (i.e., a total of one year from the review delivery date), the Assessor team shall inform ICROA of any contract with a carbon crediting programme in which they may be involved. This continued transparency allows for ongoing monitoring and management of potential Col.

Appendix 2 - Endorsement Assessment Process Diagram

