ClimatePal EU 201
CERTIFICATION PROGRAMME

Version 1.0

ClimatePal
by ISCC



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Contents

List of Tables ..... **V**
List of Figures ..... **V**
Table of Abbreviations ..... **VI**
Introduction **1**
1. Scope **2**
2. Normative References **2**
2.1 EU Legislation 2
2.2 International and European Standards 3
2.3 ClimatePal EU Normative Documents 3
3. Terms, Definitions and Verbal Forms **3**
4. Certification Programme Framework **4**
4.1 Certification Object and Specified Requirements 4
4.2 Functional Approach 5
4.3 Allocation and Precedence of Requirements 5
4.4 Controlled Programme Templates 6
5. Access to the Programme **6**
5.1 Programme Application and Eligibility Review 6
5.2 Disclosure of Participation in other Certification Schemes 7
5.3 Exclusion and Changes in Certification Arrangements 7
5.4 Participation Agreement and Registration 8
6. Operator and Group Requirements **8**
6.1 General Responsibilities 8
6.2 Activity Plan 9
6.3 Monitoring Plan 9
6.4 Monitoring Report 10
6.5 Documentation Management System and Evidence 10
6.6 Access and Cooperation 10
6.7 Changes, Errors and Reversals 11
7. Claims and Use of Certificates and Certified Units **11**
7.1 General Requirements 11
7.2 Evidence Supporting Claims 12
7.3 Certification Status, Name and Logo 12
7.4 Claims Based on Certified Units 12
7.5 Misuse and Correction 13

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8. Certification Process 13
8.1 General 13
8.2 Certification Audit 14
8.3 Re-certification Audit 15
8.4 Monitoring Audit 16
8.5 Assurance, Materiality and Risk 16
8.6 Minimum Audit Coverage 16
8.7 Certification and Re-certification Audit Report 17
8.8 Independent Review and Certification Decision 17
8.9 ClimatePal EU Review 18
9. Group Certification for Carbon Farming 18
9.1 General 18
9.2 Eligibility 18
9.3 Group Manager and Internal Control System 19
9.4 Systemic Non-Conformity 19
10. Certification Outcomes and Certificate Status 20
10.1 General 20
10.2 Certificate of Compliance 20
10.3 Updated Certificate of Compliance 20
10.4 Certificate Status and Public Status Changes 21
10.5 Refusal, Scope Reduction, Suspension, Termination, Withdrawal and Expiry 21
10.6 Facts Discovered after Issue 21
11. Non-conformities, Remediation and Re-application 21
11.1 Classification and General Rule 21
11.2 Remediation Measures and Sanctions 22
11.3 Re-Application Following Refusal or Withdrawal for a Critical Non-Conformity 22
12. Certified Units and Registry Interaction 24
12.1 Basis for Issuance 24
12.2 Unit Categories 24
12.3 Unit Expiry 26
12.4 Reversals and Liability Mechanisms 26
12.5 Erroneous or Fraudulent Issuance 26
Annex A. ClimatePal Registry Data Specification 28
A1. General Data Requirements 28
A2. Unique Identifiers and Data Linkage 28
A3. Minimum Information Concerning Operators and Activities 29

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A4. Scheme-level Information 30
A5. Certified Benefit and Sustainability Information 30
A6. Certification Information 31
A7. Certified unit Information 31
A8. Registry Transactions 32
A9. Cross-scheme Double-counting Controls 33
A10. Retirement, Cancellation and Use Controls 34
A11. Certificate Status and Unit Transferability 34
A12. Expiry and Monitoring Period Information 35
A13. Erroneous or Fraudulent Issuance 35
A14. Data Submission and Verification Responsibilities 36
A15. Publication and Access 37
A16. Data Maintenance and Correction 37
A17. Transition to the Union Registry 37

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List of Tables

Table 1: Minimum information concerning operators and activities 29
Table 2: General allocation of responsibilities for data submission and verification 36

List of Figures

Figure 1: Certification process.....14

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Table of Abbreviations

Abbreviation	Name
CB	certification body
CO_2	carbon dioxide
CRCF	Carbon Removals and Carbon Farming
EN	European Standard
EU	European Union
ISO	International Organization for Standardization
ISO/IEC	International Organization for Standardization / International Electrotechnical Commission
IT	information technology

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Introduction

Regulatory context

ClimatePal EU is a certification scheme developed in accordance with the Carbon Removals and Carbon Farming (CRCF) Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358. It is intended to provide the framework for certifying CRCF activities within the scope submitted for recognition by the European Commission.

Relationship to established certification schemes

ClimatePal EU draws on experience from established certification schemes, including the International Sustainability and Carbon Certification (ISCC) system. This experience supports the design of ClimatePal EU but does not change or replace any CRCF Regulation requirements. The ClimatePal EU scheme documentation distinguishes between the governance and oversight responsibilities of the scheme owner and the independent evaluation, review and certification responsibilities of appointed certification bodies.

Document overview

This document establishes the programme-level requirements for certification under ClimatePal EU, including access and participation, operator obligations, certification and monitoring processes, certification outcomes, claims, certified units and registry interaction. Activity-specific technical requirements are specified in the applicable ClimatePal EU certification methodologies.

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1. Scope

Programme scope

This document specifies the ClimatePal EU certification programme requirements for:

a. access to and participation in the programme;

b. operator and group obligations;

c. activity plans, monitoring plans, monitoring reports and supporting evidence;

d. certification, re-certification and monitoring at programme level;

e. certification outputs, certificate status and operator non-conformities; and

f. claims, certified units, registry interactions and publication of certification information.

Applicability

This document applies to activities within the territorial and material scope of Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358, and to certification methodologies included in ClimatePal EU's application for European Commission recognition or covered by the applicable European Commission recognition decision. It applies to individual operators. It applies to groups of operators only for carbon farming activities where group auditing is permitted by Article 12 of Commission Implementing Regulation (EU) 2025/2358 and the applicable certification methodology. Additional certification methodologies shall apply only after they have been incorporated into the ClimatePal EU scheme documentation and, where required, the recognition scope.

Exclusions and related documents

This document does not specify the governance and internal control of the certification scheme, the organisational and competence requirements for certification bodies, or the technical calculation rules of individual certification methodologies. Those matters are addressed in ClimatePal EU 101 Governance, ClimatePal EU 202 Certification Body Requirements and the applicable ClimatePal EU certification methodologies respectively.

2. Normative References

Normative reference rules

The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document. For dated references, only the edition cited applies. For undated references, the latest edition, including amendments, applies.

2.1 EU Legislation

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a. Regulation (EU) 2024/3012 establishing a European Union certification framework for permanent carbon removals, carbon farming and carbon storage in products

b. Commission Implementing Regulation (EU) 2025/2358 laying down rules on certification schemes, certification bodies and audits under Regulation (EU) 2024/3012

c. Commission Delegated Regulation (EU) 2026/285 supplementing Regulation (EU) 2024/3012 by establishing the certification methodologies for permanent carbon removals activities

d. Regulation (EC) No 765/2008 setting out requirements for accreditation

e. Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, as applicable to the protection of persons reporting infringements or lodging complaints in good faith

2.2 International and European Standards

a. EN ISO/IEC 17065:2012, Conformity assessment — Requirements for bodies certifying products, processes and services

b. EN ISO/IEC 17067:2013, Conformity assessment — Fundamentals of product certification and guidelines for product certification schemes

c. EN ISO/IEC 17029:2019, Conformity assessment — General principles and requirements for validation and verification bodies

d. EN ISO 14065:2021, General principles and requirements for bodies validating and verifying environmental information

2.3 ClimatePal EU Normative Documents

a. ClimatePal EU 101 Governance

b. ClimatePal EU 110 Glossary

c. ClimatePal EU 202 Certification Body Requirements

d. Applicable ClimatePal EU certification methodologies and methodology-specific procedures

3. Terms, Definitions and Verbal Forms

Terminology and drafting rules

For the purposes of this document, the terms and definitions in Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358 and ClimatePal EU 110 Glossary apply. Where wording in a ClimatePal EU document is inconsistent with a legal definition, the legal definition prevails.

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Legal terminology

ClimatePal EU scheme documents shall consistently use the terms and definitions established in Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358, Commission Delegated Regulation (EU) 2026/285 and any other applicable legally binding acts adopted pursuant to Regulation (EU) 2024/3012, as reflected and supplemented for scheme-specific terms in the ClimatePal EU 110 Glossary.

Verbal forms and materiality

In this document, "shall" indicates a mandatory requirement, "should" indicates a recommendation, "may" indicates permission and "can" indicates a possibility or capability. The same term is used for the same concept throughout the ClimatePal EU scheme documents. "Material" means capable of affecting scheme recognition, legal compliance, certification integrity, registry integrity, impartiality or the effective operation of the scheme.

4. Certification Programme Framework

4.1 Certification Object and Specified Requirements

See 4.1 and 5.1 in EN ISO/IEC 17067:2013 and 7.1 in EN ISO/IEC 17065:2012.

Note: The certification object is the activity and its conformity with specified requirements. Certification under this programme does not certify the operator's entire organisation, products or services.

Certification object

The certification object shall be the carbon removal or carbon farming activity within its defined geographical, temporal and operational boundaries, for which an operator or group of operators seeks certification under an applicable ClimatePal EU certification methodology.

Specified requirements

Certification shall determine conformity of the certification object with:

a. Regulation (EU) 2024/3012 and regulations and other legally binding acts adopted pursuant to it;

b. the applicable European Commission-recognised certification methodology;

c. the requirements of this document; and

d. other applicable normative ClimatePal EU documents and controlled requirements identified in Clause 2.

Assessment evidence

The conformity assessment shall include, as applicable, the activity plan, monitoring plan, monitoring reports and the expected or verified net carbon removal benefit or net soil emission reduction benefit.

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Certification outputs

Certificates of compliance, updated certificates of compliance and certified units are certification outputs and shall be issued only where the applicable requirements of this programme are fulfilled.

4.2 Functional Approach

See 5.1.1 and Table 1 in EN ISO/IEC 17067:2013.

Certification functions

The certification process under this programme shall comprise the following functions:

a. selection, including application, eligibility review, definition of scope, identification of requirements and preparation of the activity and monitoring plans;

b. determination, including certification, re-certification and monitoring audits;

c. review of the evidence and audit results;

d. certification decision;

e. attestation through a certificate of compliance or updated certificate of compliance; and

f. surveillance, including re-certification, monitoring audits and controls relevant to continued certification status.

Certification body requirements

Requirements for the competent and impartial performance of the review, certification decision and attestation functions are specified in ClimatePal EU 202 Certification Body Requirements.

4.3 Allocation and Precedence of Requirements

See 6.5 to 6.7 in EN ISO/IEC 17067:2013 and note.

Precedence of requirements

Note: This clause allocates requirements among ClimatePal EU documents. It does not reduce any requirement of Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358 or an applicable certification methodology.

Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358 shall prevail over ClimatePal EU documents. Activity-specific technical requirements shall be determined by the applicable certification methodology. ClimatePal EU documents shall be applied according to their respective scope and purpose. Where requirements overlap, the more specific requirement shall apply, provided that it is consistent with Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358.

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4.4 Controlled Programme Templates

See 6.5.1 and 6.7 in EN ISO/IEC 17067:2013.

Required templates

Approved ClimatePal EU templates shall be used, as applicable, for the programme application, activity plan, monitoring plan, monitoring report, certification audit report, re-certification audit report, monitoring audit report, certificate of compliance and updated certificate of compliance.

Templates content

Each template shall capture the information required by Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358, this document and the applicable certification methodology. Additional instructions, fields or electronic controls shall not omit, restrict or weaken an applicable requirement.

Document control

Requirements for approval, version control, amendment and withdrawal of controlled ClimatePal EU documents and templates are specified in ClimatePal EU 101 Governance.

5. Access to the Programme

5.1 Programme Application and Eligibility Review

See 7.2 and 7.3 in EN ISO/IEC 17065:2012, 9.2 in EN ISO/IEC 17029:2019 and 6.5.1 in EN ISO/IEC 17067:2013.

Note: The review under this clause concerns eligibility to proceed with certification under the ClimatePal EU programme. Acceptance of an application does not establish programme participation.

Application information

An operator or group of operators seeking certification shall submit an application using the approved ClimatePal EU Application Form. The application shall identify the applicant, the activity, its location and boundaries, the applicable certification methodology, the requested certification scope, the proposed certification body and any participation in another certification scheme.

Eligibility review

ClimatePal EU shall review the application for completeness and confirm that:

a. the activity is within the scope of Regulation (EU) 2024/3012 and within the scope for which ClimatePal EU is seeking or has obtained Commission recognition;

b. the activity takes place within the territorial scope permitted by Regulation (EU) 2024/3012;

c. an applicable certification methodology adopted under Article 8 of Regulation (EU) 2024/3012 is available;

d. the applicant has disclosed the information required by 5.2;

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e. the same activity is not registered under another carbon removal or soil emission reduction certification scheme;

f. the activity is not excluded by Article 1(3) of Regulation (EU) 2024/3012, unless an express exception applies; and

g. the applicant accepts the applicable ClimatePal EU terms and publication requirements.

Application decision

ClimatePal EU shall record the outcome of the application review. Where an application is accepted, ClimatePal EU shall register the operator or group of operators as an applicant for certification. Acceptance of the application and applicant registration shall not confer programme participation or certification status. Where an application is not accepted, ClimatePal EU shall state the reason and, where applicable, the conditions for a new application.

5.2 Disclosure of Participation in other Certification Schemes

See 7.2 in EN ISO/IEC 17065:2012.

Previous scheme participation

In accordance with Article 8(1) of Commission Implementing Regulation (EU) 2025/2358, the operator or group of operators shall disclose in the application:

a. whether it or its legal predecessor currently participates, or participated during the previous five years, in another carbon removal or soil emission reduction certification scheme;

b. the audit reports from the last two re-certification audits under another scheme, including the detailed findings and any decision during the previous five years to suspend or withdraw a certificate; and

c. whether it withdrew from another certification scheme before the first re-certification audit.

Information exchange

The operator or group of operators shall authorise the exchange of this information between certification schemes. In accordance with Article 8(5) of Commission Implementing Regulation (EU) 2025/2358, ClimatePal EU shall ensure an efficient and timely exchange with other certification schemes of the information specified in points a) to c).

5.3 Exclusion and Changes in Certification Arrangements

See 7.3 in EN ISO/IEC 17065:2012.

Grounds for exclusion

ClimatePal EU shall exclude an operator or group of operators where:

a. the information required by 5.2 has not been disclosed;

b. the operator, group of operators or its legal predecessor failed a certification audit under another scheme; or

c. the operator, group of operators or its legal predecessor withdrew from another scheme before the first re-certification audit.

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Exceptions to exclusion

In accordance with Article 8(3) of Commission Implementing Regulation (EU) 2025/2358, the exclusion in point b) shall not apply where the failed certification audit took place more than three years before the new application or where the other scheme ceased certification activities and thereby prevented re-application. In that case, the certification audit scope shall cover the earlier shortcomings.

Withdrawal exception

In accordance with Article 8(4) of Commission Implementing Regulation (EU) 2025/2358, the exclusion in point c) shall not apply where the applicant demonstrates that withdrawal was unavoidable or necessary and was not caused by a critical or major non-conformity or by neglect to implement the former scheme's requirements.

Change in certification body

A change of certification body within ClimatePal EU shall not close or reset an open non-conformity, suspension, investigation or other certification action. The operator shall authorise the transfer of relevant certification records. Certification bodies shall transfer and handle those records in accordance with Clause 7.12.2 of ClimatePal EU 202 Certification Body Requirements.

5.4 Participation Agreement and Registration

See 6.5.1 in EN ISO/IEC 17067:2013 and 7.2 in EN ISO/IEC 17065:2012.

Participation agreement

Upon acceptance of the application, the operator or group of operators shall enter the ClimatePal EU Scheme Participation Agreement. The agreement shall bind the applicant to the applicable scheme rules, fees, data-processing and publication requirements, claims controls, cooperation duties, record-retention requirements and sanctions. Entry into the agreement shall not itself establish programme participation or certification status.

Participation and certification

Acceptance of a programme application and registration establish applicant status only and do not establish programme participation. Certification of an activity requires successful passing of the certification audit, a positive certification decision and a valid certificate of compliance. Programme participation shall begin only once these requirements have been fulfilled.

Certification body eligibility

ClimatePal EU shall confirm that the certification body selected by the operator or group of operators is currently appointed for the requested scope. Certification body appointment and requirements are specified in ClimatePal EU 101 Governance and ClimatePal EU 202 Certification Body Requirements.

6. Operator and Group Requirements

6.1 General Responsibilities

See 7.2 in EN ISO/IEC 17065:2012 and 9.2 in EN ISO/IEC 17029:2019.

General obligations

The operator or group of operators shall:

a. implement and control the activity within the declared scope and boundaries;

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b. comply with Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358, the applicable certification methodology and the requirements of this programme;

c. prepare complete, accurate, consistent, traceable and current information;

d. maintain the activity plan, monitoring plan, monitoring reports and supporting evidence;

e. provide access to premises, personnel, systems, data and documentation required for audits in accordance with Article 9(4) of Regulation (EU) 2024/3012 and 6.6;

f. notify material changes, errors and reversals in accordance with 6.7;

g. implement remediation measures within the applicable period in accordance with Clause 11; and

h. make only claims permitted by Clause 7.

Group certification requirements

Additional requirements applicable to group certification and group auditing are specified in Clause 9.

6.2 Activity Plan

See 9.2 and 9.4 in EN ISO/IEC 17029:2019.

Submission and content

In accordance with Article 9(1) of Regulation (EU) 2024/3012, after application acceptance and in advance of the certification audit, the operator or group of operators shall submit an activity plan using the approved ClimatePal EU 331 Activity Plan Template. The activity plan shall contain at least the information required by Article 3(1) and Annex I to Commission Implementing Regulation (EU) 2025/2358 and by the applicable certification methodology. The ClimatePal EU 331 Activity Plan Template specifies the information to be provided for each of these requirements

Expected conformity

The activity plan shall demonstrate how the activity is expected to comply with Articles 4 to 7 of Regulation (EU) 2024/3012 and the applicable certification methodology. Expected results shall be identified as projections and shall not be presented as verified results.

6.3 Monitoring Plan

See 9.4 in EN ISO/IEC 17029:2019.

Submission and content

In accordance with Article 9(1) of Regulation (EU) 2024/3012, the operator or group of operators shall submit a monitoring plan using the approved ClimatePal EU monitoring plan template within the ClimatePal EU 331 Activity Plan Template. The monitoring plan shall contain at least the information required by Article 3(2) and Annex II to Commission Implementing Regulation (EU) 2025/2358 and any additional methodology-specific monitoring requirements.

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Data and quality controls

The monitoring plan shall define responsibilities, data flows and quality controls in sufficient detail to permit independent verification and reconstruction of the reported results.

6.4 Monitoring Report

See 9.5 in EN ISO/IEC 17029:2019.

Re-certification reporting

In accordance with Article 11(1) and (2) of Commission Implementing Regulation (EU) 2025/2358, before each re-certification audit, the operator or group of operators shall submit a monitoring report using the approved ClimatePal EU 332 Monitoring Report Template. The report shall contain the information needed to calculate the net carbon removal benefit or net soil emission reduction benefit and to demonstrate conformity with liability and sustainability requirements.

Monitoring audit reporting

In accordance with Article 11(1) and (3) of Commission Implementing Regulation (EU) 2025/2358, before each monitoring audit, the monitoring report shall contain the information required by the applicable certification methodology and the information needed to assess monitoring of stored carbon and each identified or suspected reversal.

6.5 Documentation Management System and Evidence

See 7.12 in EN ISO/IEC 17065:2012 and 9.11 in EN ISO/IEC 17029:2019.

Documentation management system

In accordance with Article 10(5)(a) and (b) of Commission Implementing Regulation (EU) 2025/2358, the operator or group of operators shall maintain a documentation management system and an auditable system for the safekeeping and review of all evidence related to the information and claims it makes or relies on under this programme.

Evidence safeguards

Records and supporting evidence shall be identifiable, retrievable and protected against unauthorised alteration or loss. Changes to data and calculations shall be traceable where they may affect certification results.

Record retention

In accordance with Article 10(5)(c) of Commission Implementing Regulation (EU) 2025/2358, all evidence needed to demonstrate conformity with Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358, the applicable certification methodology and this programme shall be retained for at least five years after the end of the monitoring period, or longer where required by national law or the applicable certification methodology.

Responsibility for audit information

In accordance with Article 10(5)(d) of Commission Implementing Regulation (EU) 2025/2358, the operator or group of operators shall remain responsible for preparing and providing all information necessary for the auditing of such evidence, including where data collection, monitoring, calculation or record keeping is performed by a third party.

6.6 Access and Cooperation

Audit access

In accordance with Article 9(4) of Regulation (EU) 2024/3012, the operator or group of operators shall provide the certification body with access to the activity premises, relevant personnel, records, data systems, documentation and other

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information necessary to carry out certification, re-certification and monitoring audits.

Official cooperation

In accordance with Article 15(1) of Commission Implementing Regulation (EU) 2025/2358, the operator or group of operators shall cooperate with ClimatePal EU, the European Commission and competent national authorities and shall provide information or access where required within the scope of their respective lawful functions.

Failure to cooperate

Failure to provide required access or cooperation shall constitute a non-conformity under Clause 11 and shall be handled in accordance with the applicable certification or programme-participation measures. In accordance with Article 15(7) of Commission Implementing Regulation (EU) 2025/2358, where an operator or group of operators fails or is unwilling to comply with the cooperation requirements referred to in Article 15(1) to (5) of Commission Implementing Regulation (EU) 2025/2358, ClimatePal EU shall exclude the operator or group of operators from participation in the programme.

6.7 Changes, Errors and Reversals

See 7.10 in EN ISO/IEC 17065:2012 and 9.8 in EN ISO/IEC 17029:2019.

Material changes

The operator or group of operators shall notify the certification body and ClimatePal EU without undue delay of a change that may affect the certified scope, the applicable methodology, the activity boundaries, ownership, monitoring, quantification, sustainability, liability, permanence or the accuracy of published information.

Errors and reversals

The operator or group of operators shall also notify any material error, omission, misstatement, suspected fraud affecting certification, or reversal discovered after issue of an audit report, certificate or certified unit. The certification status, audit scope and validity of affected certified units shall be reviewed in accordance with the applicable provisions of this programme.

Changed requirements

Operators and groups of operators shall implement applicable new or amended requirements by the effective date communicated in accordance with ClimatePal EU 101 Governance. Failure to implement an applicable requirement by that date shall constitute a non-conformity.

7. Claims and Use of Certificates and Certified Units

7.1 General Requirements

See 4.1.3 in EN ISO/IEC 17065:2012 and 6.5.6, 6.5.11 and 6.5.12 in EN ISO/IEC 17067:2013.

Accuracy of claims

Claims relating to ClimatePal EU certification shall be accurate, clear, specific, verifiable and consistent with the applicable certificate of compliance, audit report, certification methodology and registry information.

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Scope of claims

Claims shall remain within the scope of the certified activity, applicable methodology, certification period and verified results. Certification of an activity shall not be presented as certification of the operator's entire organisation, products, services or environmental benefits that were not included in the assessment.

Projected results and co-benefits

Expected or projected results shall be clearly distinguished from results that have been achieved and verified. Claims concerning sustainability co-benefits may only be made where those benefits were assessed under the applicable certification methodology.

7.2 Evidence Supporting Claims

See 7.12 in EN ISO/IEC 17065:2012 and 9.11 in EN ISO/IEC 17029:2019.

Claim substantiation

A claim relating to ClimatePal EU certification shall be supported by evidence that is traceable to the relevant activity, certification output, monitoring period, calculation or registry information, as applicable. Records and evidence supporting claims shall be maintained in accordance with 6.5.

7.3 Certification Status, Name and Logo

See 4.1.3 in EN ISO/IEC 17065:2012 and 6.5.6 in EN ISO/IEC 17067:2013.

Certification status

An operator shall not claim that an activity is certified under ClimatePal EU unless a valid certificate of compliance is in place. Any certification claim shall remain within the scope and validity period stated in the certificate. Claims shall be amended or discontinued without undue delay where certification is suspended, withdrawn, terminated or expired.

Name and scheme marks

The ClimatePal name, logo and other scheme marks shall not be used unless the applicant is authorised to do so and the use complies with the controlled ClimatePal EU Claims Guidance. They shall not be altered, used outside the certified scope or displayed in a manner that implies endorsement by the European Union, ClimatePal EU or the certification body beyond the certification status and scope actually granted.

7.4 Claims Based on Certified Units

See 6.5.11 and 6.5.12 in EN ISO/IEC 17067:2013.

Traceability of unit claims

For the purposes of the traceability and double-counting safeguards established in Article 12 of Regulation (EU) 2024/3012, a claim based on certified units shall correspond to the information recorded in the applicable registry and shall permit traceability to the unit type, quantity, activity, certificate, methodology, monitoring period and current unit status and, where applicable, the beneficiary and purpose of use.

Single use of units

Claims based on certified units shall comply with the issuance, use, retirement and cancellation requirements in Clause 12. A certified unit shall not be used to support multiple claims unless such use is expressly permitted under applicable regulation, guidance or ClimatePal EU requirements. In all cases, the registry shall

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ensure transparency, traceability and safeguards against double counting and misleading claims.

External compliance claims

ClimatePal EU certification does not by itself constitute a corresponding adjustment, an authorisation under Article 6 of the Paris Agreement or eligibility under another compliance scheme. No claim shall imply such status unless it has been separately established under the applicable legal framework.

7.5 Misuse and Correction

See 4.1.3 in EN ISO/IEC 17065:2012 and 6.5.12 in EN ISO/IEC 17067:2013.

Misuse

False, inaccurate, unsupported or misleading claims, unauthorised use of a certificate or scheme mark, and continued use of certification claims following suspension, withdrawal, termination or expiry shall constitute non-conformities.

Correction and consequences

The affected claim, publication or other communication shall be corrected or withdrawn without undue delay. Further measures shall be taken in accordance with Clause 10 on certification outcomes and certificate status, Clause 11 on non-conformities and remediation, Clause 12 on certified units and registry interaction, and ClimatePal EU 101 Governance on publication, as applicable.

8. Certification Process

8.1 General

See 7.1 in EN ISO/IEC 17065:2012, 5.1.1 in EN ISO/IEC 17067:2013 and 9.1 in EN ISO/IEC 17029:2019.

Note: This clause defines the certification process and required outputs. Organisational, competence and impartiality requirements applicable to certification bodies and their personnel are specified in ClimatePal EU 202 Certification Body Requirements.

Certification process

The certification process (Figure 1) shall comprise application and scope confirmation, audit planning, determination activities, findings and remediation, independent technical review, certification decision, issue of the applicable certification output, ClimatePal EU review, publication and ongoing surveillance. Detailed requirements directed to certification bodies for application review, audit planning and conduct, technical review and certification decisions are specified in ClimatePal EU 202 Certification Body Requirements.

Audit information exchange

In accordance with Article 10(3) of Commission Implementing Regulation (EU) 2025/2358, ClimatePal EU shall ensure an efficient and timely exchange of audit information with other certification schemes to support the effective preparation and conduct of audits

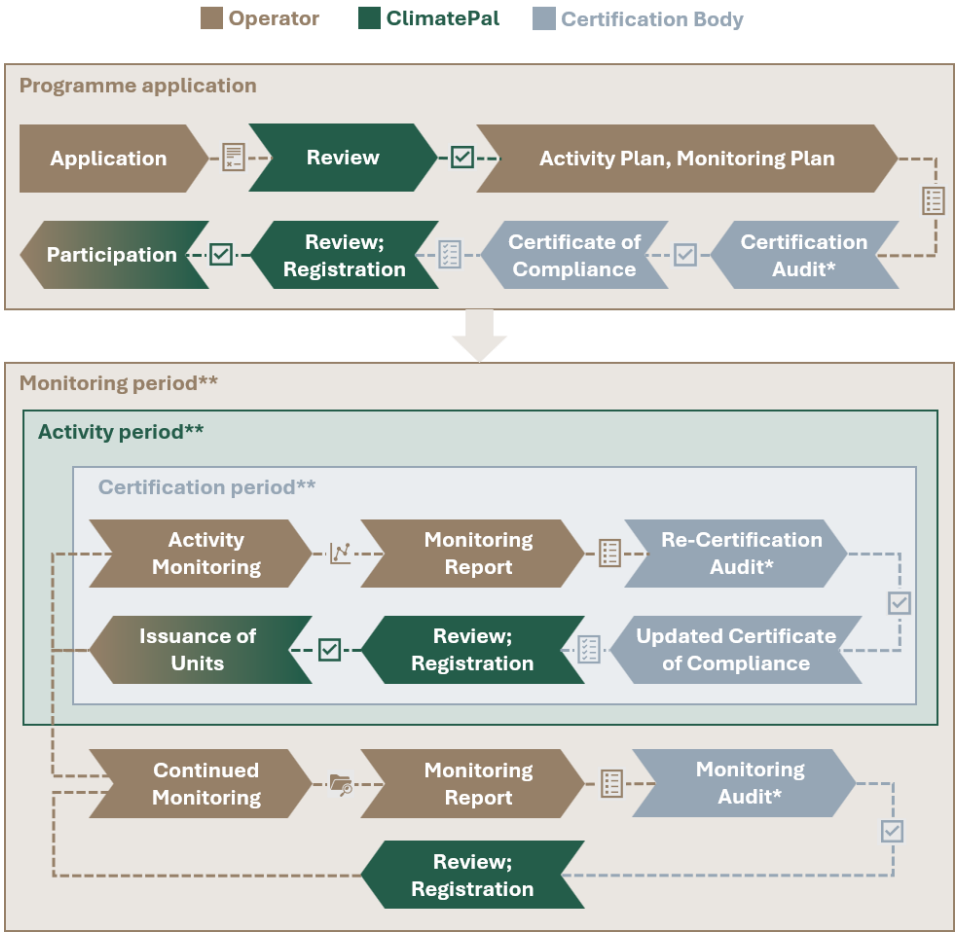
Group certification

Where certification concerns a group of operators, the additional requirements for group certification and group auditing in Clause 9 shall apply.

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Audit functions

Certification audits constitute validation of planned future performance. Re-certification audits constitute verification of historical monitoring results. Monitoring audits verify continued monitoring of stored carbon and reversals. Figure 1 illustrates the relationship between the certification audit, monitoring activities and re-certification audits over time.



** Independent technical review and certification decision, as specified in ClimatePal EU 202 Certification Body Requirements, are not illustrated separately for the purpose of conciseness.*

*** Monitoring periods, activity periods and certification periods are specified in the applicable ClimatePal EU certification methodology. Depending on the methodology, the monitoring period may end with the activity period, in which case no continued monitoring or monitoring audits occur. The maximum duration of the certification period is methodology-specific and may, in some cases, span the entire activity period.*

Figure 1: Certification process

8.2 Certification Audit

See 7.4 in EN ISO/IEC 17065:2012, 9.2 to 9.7 in EN ISO/IEC 17029:2019 and Clauses 8 and 9 in EN ISO 14065:2021.

Audit prerequisite, participation and location

In accordance with Article 10(1) of Commission Implementing Regulation (EU) 2025/2358, before an activity is certified, and before the operator or group of operators is allowed to participate in ClimatePal EU, the operator or group of operators shall successfully pass a certification audit. The certification audit shall

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include an on-site audit and shall provide at least reasonable assurance of the effectiveness of the applicable internal processes. Programme participation shall begin only following successful passing of the certification audit, a positive certification decision and issuance of a valid certificate of compliance. Where group auditing is used, sampling and any desk-based audit of group members shall comply with Clause 9 and Clause 7.4.4.4 of ClimatePal EU 202 Certification Body Requirements. The certification audit and its position within the certification process and audit cycle are illustrated in Figure 1.

Validation and conformity

The certification audit shall validate the activity plan and monitoring plan, verify that submitted information is accurate and reliable, and determine conformity of the activity with Articles 4 to 7 of Regulation (EU) 2024/3012 and the applicable certification methodology.

Expected results

The certification audit shall assess expected results. It shall not by itself provide the basis for issuing certified units, unless the certification audit and first re-certification audit are combined in accordance with 8.3.

8.3 Re-certification Audit

See 7.9 in EN ISO/IEC 17065:2012, 9.2 to 9.7 in EN ISO/IEC 17029:2019 and Clauses 8 and 9 in EN ISO 14065:2021.

Frequency

In accordance with Article 9(3) of Regulation (EU) 2024/3012 and Article 10(2) of Commission Implementing Regulation (EU) 2025/2358, a re-certification audit shall be carried out at least every five years or more frequently where so specified in the applicable certification methodology based on the characteristics of the relevant activity. Where defined by the applicable certification methodology, the period between a re-certification audit and the most recent preceding certification audit or re-certification audit constitutes the certification period. The applicable audit frequency shall be determined in accordance with the certification methodology. This programme does not establish an additional minimum interval between re-certification audits. Where group auditing is used, sampling for re-certification shall additionally comply with Clause 9 and Clause 7.4.4.4 of ClimatePal EU 202 Certification Body Requirements. The re-certification cycle is illustrated in Figure 1.

Verification of results

In accordance with Article 9(3) of Regulation (EU) 2024/3012, the re-certification audit shall reconfirm conformity of the activity with Articles 4 to 7 of Regulation (EU) 2024/3012 and shall verify the net carbon removal benefit or net soil emission reduction benefit generated during the relevant monitoring period.

Combined audits

In accordance with Article 10(2) of Commission Implementing Regulation (EU) 2025/2358, the operator or group of operators may request that the certification audit and first re-certification audit take place at the same time. In that case, the audit shall separately address validation of the plans and verification of historical results.

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8.4 Monitoring Audit

See 9.5 to 9.8 in EN ISO/IEC 17029:2019 and Clause 9 in EN ISO 14065:2021.

Frequency and purpose

In accordance with Article 10(2) of Commission Implementing Regulation (EU) 2025/2358, monitoring audits shall be carried out at the frequency set by the applicable certification methodology. They shall verify implementation of the monitoring plan, continued storage of carbon and any reversal that has occurred or may have occurred.

Audit focus and findings

The scope and method of a monitoring audit may focus on the monitoring and liability requirements relevant to the activity. Any finding affecting certification status or the validity of certified units shall be handled in accordance with Clauses 10 to 12. Changes to public information shall be handled in accordance with ClimatePal EU 101 Governance.

8.5 Assurance, Materiality and Risk

See 9.4 and 9.5 in EN ISO/IEC 17029:2019 and Clauses 8 and 9 in EN ISO 14065:2021.

Note: Detailed requirements for audit teams, competence, impartiality, technical review and certification decisions are specified in ClimatePal EU 202 Certification Body Requirements.

Assurance level and materiality

Certification and re-certification audits shall be planned and performed at a reasonable level of assurance. The audit shall be designed to detect material errors, omissions and misstatements in the information submitted by the operator or group of operators.

Risk-based audit approach

In accordance with Article 10(4)(c), (d) and (h) of Commission Implementing Regulation (EU) 2025/2358, the audit scope, intensity, duration, sampling and evidence-gathering methods shall reflect the overall risk profile, complexity, scale, number of sites, data systems, previous findings, changes and methodology-specific risks of the activity.

Group auditing

Where group auditing is used, the group-level risk assessment, sampling and audit approach shall additionally comply with Clause 9 and Clause 7.4.4.4 of ClimatePal EU 202 Certification Body Requirements.

8.6 Minimum Audit Coverage

See 9.4 to 9.6 in EN ISO/IEC 17029:2019.

Minimum audit elements

In accordance with Article 10(4) of Commission Implementing Regulation (EU) 2025/2358, each certification and re-certification audit shall cover at least:

a. identification of the activity relevant to the scheme rules;

b. identification of the operator's relevant control systems and organisation and checks of their effective implementation;

c. analysis of risks that could lead to a material misstatement;

d. a validation or verification plan corresponding to the risk analysis, scope and complexity of the activity and defining the sampling methods;

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e. implementation of the plan by gathering evidence in accordance with the sampling methods and any additional evidence needed for the conclusion;

f. requests for missing audit-trail elements, explanations of variations and revision of claims or calculations before the conclusion;

g. verification of the accuracy of data recorded by the operator; and

h. adaptation of the audit intensity, scope or both to the overall risk profile determined under point c).

Application to groups

For group certification, these requirements apply to the group-level audit and to sampled group members, as applicable, subject to Clause 9 and Clause 7.4.4.4 of ClimatePal EU 202 Certification Body Requirements.

8.7 Certification and Re-certification Audit Report

See 9.7.2 and 9.11 in EN ISO/IEC 17029:2019.

Report content

Each certification, re-certification and monitoring audit shall result in an audit report using the approved ClimatePal EU 333 Audit Report Template. In accordance with Article 9(2) and (3) of Regulation (EU) 2024/3012 and Article 3(3) and Annex III to Commission Implementing Regulation (EU) 2025/2358, certification and re-certification audit reports shall contain at least the information required by Annex III to Commission Implementing Regulation (EU) 2025/2358 and by the applicable certification methodology. They shall distinguish expected results from verified results. A monitoring-audit report shall document the audit scope, evidence assessed, findings, conclusion and any effect on certification status or certified units.

Audit summary and publication

The report shall include the summary required by Annex III. Publication of certification and re-certification audit reports and the handling of commercially sensitive information shall comply with Article 9(2) and (3) of Regulation (EU) 2024/3012 and ClimatePal EU 101 Governance. The certification audit report and corresponding certificate shall be submitted to ClimatePal for review and publication in the certification registry in accordance with ClimatePal EU 101 Governance 9.1 and 10.1. The certification audit, issuance of the certificate of compliance and subsequent registration are illustrated in Figure 1.

8.8 Independent Review and Certification Decision

See 7.5 and 7.6 in EN ISO/IEC 17065:2012, 9.6 and 9.7.1 in EN ISO/IEC 17029:2019 and note.

Note: The detailed requirements for independent technical review, certification decision personnel and separation from the audit team are specified in ClimatePal EU 202 Certification Body Requirements.

Review and decision

No certificate of compliance or updated certificate of compliance shall be issued until the audit evidence, findings, remediation and conclusion have passed the

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independent technical review and certification decision process specified in ClimatePal EU 202 Certification Body Requirements.

Certification outcome

Certification outcomes and changes in certificate status shall be handled in accordance with Clause 10.

8.9 ClimatePal EU Review

See 6.5.9 in EN ISO/IEC 17067:2013 and note.

Note: The ClimatePal EU review is a scheme completeness and consistency control. It does not replace the certification decision of the certification body.

Scheme review

In accordance with Article 9(2) and (3) of Regulation (EU) 2024/3012, before publication and registry processing, ClimatePal EU shall perform an administrative completeness and consistency check of each certification or re-certification audit report and certificate of compliance. The check shall be limited to use of approved templates, consistency between certification outputs, registry readiness and conformity with publication rules. It shall not re-evaluate audit evidence or replace the certification body's independent review or certification decision.

Publication

In accordance with Article 9(2) and (3) of Regulation (EU) 2024/3012, following completion of the ClimatePal EU review, the applicable certification outputs shall be published in accordance with ClimatePal EU 101 Governance. The re-certification audit report and corresponding updated certificate shall be submitted to ClimatePal EU for review and publication in the certification registry in accordance with ClimatePal EU 101 Governance 9.1 and 10.1.

9. Group Certification for Carbon Farming

9.1 General

Group certification

In accordance with Article 12 of Commission Implementing Regulation (EU) 2025/2358, a group of operators seeking certification using the group-auditing provisions of this clause shall be eligible for that approach only for carbon farming activities and where the requirements of this clause are met. Unless otherwise specified, the certification requirements of this document shall apply to the group of operators and its members, as applicable. Detailed sampling, audit-conduct and reporting requirements directed to certification bodies are specified in Clause 7.4.4.4 of ClimatePal EU 202 Certification Body Requirements.

9.2 Eligibility

Group eligibility

A group of operators shall be eligible under this clause only where:

a. in accordance with Article 12(1)(a) of Commission Implementing Regulation (EU) 2025/2358, the activity areas are geographically

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proximate and have similar pedoclimatic characteristics, such as climatic or soil conditions;

b. in accordance with Article 12(1)(a) of Commission Implementing Regulation (EU) 2025/2358, the activity areas are geographically proximate and have similar pedoclimatic characteristics, such as climatic or soil conditions;

c. the activities use similar processes and procedures for calculating carbon removals or soil emission reductions;

d. all group members apply the same certification methodology; and

e. the group operates a documented, risk-based internal control system under the responsibility of an identified group manager.

9.3 Group Manager and Internal Control System

Group manager

The group shall designate a group manager that legally represents the group for the purposes of certification and is responsible for ensuring that each group member conforms to the applicable certification methodology and this programme.

Internal controls

The group shall maintain a documented internal control system that defines at least:

a. the responsibilities and authority of the group manager;
b. the responsibilities of group members;
c. the procedures used to assess and monitor conformity of group members;
d. the internal inspection process and its frequency;
e. the identification and handling of non-conformities;
f. corrective-action and follow-up procedures; and
g. the records necessary to demonstrate operation of the internal control system.

Member conformity

The group manager shall use the internal control system to verify that every group member included within the certified scope conforms to the applicable certification methodology and this programme.

9.4 Systemic Non-Conformity

Systemic non-conformity

In accordance with Article 12(5) of Commission Implementing Regulation (EU) 2025/2358, systemic non-conformity of group members across the whole audit sample shall result in suspension or withdrawal of the whole group certification, as applicable, in accordance with Clause 11. Detailed sampling and audit-conduct requirements are specified in Clause 7.4.4.4 of ClimatePal EU 202 Certification Body Requirements.

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10. Certification Outcomes and Certificate Status

10.1 General

See 7.7 to 7.11 in EN ISO/IEC 17065:2012, 9.7 and 9.8 in EN ISO/IEC 17029:2019 and 5.1.1 in EN ISO/IEC 17067:2013.

Certification outcomes

The certification decision shall result in one of the following outcomes, as applicable: certification granted, refused, continued, scope reduced, suspended, restored, withdrawn or terminated. A certificate shall expire when its validity period ends without renewal.

10.2 Certificate of Compliance

See 7.7.1 in EN ISO/IEC 17065:2012.

Certificate content

In accordance with Article 9(2) and (3) of Regulation (EU) 2024/3012, the certificate of compliance shall use the approved ClimatePal EU template and shall contain, as applicable, the information required by Annex II to Regulation (EU) 2024/3012 and by the applicable certification methodology. Requirements directed to certification bodies for authorisation and issue of certification documentation are specified in Clause 7.7 of ClimatePal EU 202 Certification Body Requirements. The issuance of the certificate of compliance within the certification process is illustrated in Figure 1.

Certificate vs units

A certificate of compliance is a certification document for the activity. It is not a certified unit and shall not be represented or traded as a certified unit.

Expected benefits

The initial certificate shall identify the validated expected net carbon removal benefit or expected net soil emission reduction benefit and shall clearly state that certified units are not issued on the basis of expected results alone.

Certificate validity

The certificate validity period shall not extend beyond the date by which the next re-certification audit is required under the applicable certification methodology.

10.3 Updated Certificate of Compliance

See 7.7.1 and 7.9 in EN ISO/IEC 17065:2012 and 9.7.2 in EN ISO/IEC 17029:2019.

Verified results

In accordance with Article 9(3) of Regulation (EU) 2024/3012, following a positive re-certification decision by which certification is continued, an updated certificate of compliance shall be issued. It shall reflect the verified net carbon removal benefit or net soil emission reduction benefit generated during the completed monitoring period and the quantity and validity of certified units that may be issued. The re-certification cycle leading to an updated certificate of compliance is illustrated in Figure 1.

Combined audits

Where, at the request of the operator, the certification audit and first re-certification audit are conducted at the same time, the certificate shall separately identify validated plans and verified historical results.

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10.4 Certificate Status and Public Status Changes

See 7.8 and 7.11 in EN ISO/IEC 17065:2012.

Certificate status

In accordance with Article 9(2) of Commission Implementing Regulation (EU) 2025/2358, the current status of certificates of compliance shall be publicly available through the ClimatePal Registry in accordance with ClimatePal EU 101 Governance. Operators with a withdrawn, terminated or expired certificate shall remain listed in the registry for at least 36 months after the date of withdrawal, termination or expiry, and any changes in the certification status of operators shall be made public without delay.

10.5 Refusal, Scope Reduction, Suspension, Termination, Withdrawal and Expiry

See 7.11 in EN ISO/IEC 17065:2012 and 6.5.8 in EN ISO/IEC 17067:2013.

Certification refusal

Certification shall not be granted where a critical or major non-conformity prevents issuance of a certificate under Clause 11.

Scope reduction

A certified scope may be reduced only where the remaining scope is clearly identifiable, independently conforming and not misleading. Certification claims made by the operator shall be limited to the remaining certified scope.

Status consequences

During suspension, no new certified units shall be issued for the suspended scope, and the operator shall not make a claim of valid certification for that scope. Termination, withdrawal or expiry shall end the operator's right to use the certificate and ClimatePal EU certification marks for the affected scope. The status of units issued before a certificate-status change shall be determined under Clause 12.

10.6 Facts Discovered after Issue

Post-issue facts

The operator shall report, in accordance with Clause 6.7, any fact identified after issuance of the certificate of compliance that may materially affect the conformity of the certified activity, the certificate of compliance or the validity of certified units.

11. Non-conformities, Remediation and Re-application

11.1 Classification and General Rule

Classification and minimum consequences

Operator and group non-conformities shall be classified as critical, major or minor in accordance with Article 6(2) to (5) of Commission Implementing Regulation (EU) 2025/2358. The minimum consequences specified in 11.2 shall apply in accordance with Article 7 of Commission Implementing Regulation (EU) 2025/2358. Scheme-level oversight and measures within ClimatePal EU's authority are specified in ClimatePal EU 101 Governance.

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11.2 Remediation Measures and Sanctions

Remediation requirements

The operator or group of operators shall implement the required correction and corrective action within the applicable period and shall provide evidence sufficient to verify effective remediation.

Minimum consequences

The following minimum consequences shall apply in accordance with Article 7(2) to (7) of Commission Implementing Regulation (EU) 2025/2358:

a. where a critical non-conformity is identified before initial certification, no certificate of compliance shall be issued. A new application shall not be accepted until the applicable waiting period specified in 11.3 has elapsed;

b. where a critical non-conformity is identified after certification, the certificate shall be withdrawn immediately, and no further certified units shall be issued for the affected certification;

c. where a major non-conformity is identified before initial certification, no certificate of compliance shall be issued until remediation has been completed and verified;

d. where a major non-conformity is identified after certification, the certificate shall be suspended immediately. If remediation is not completed within 90 days after notification, the certificate shall be withdrawn; and

e. a minor non-conformity shall be remediated within 12 months after notification.

Allocation of actions

Certificate-related actions are governed by ClimatePal EU 202 Certification Body Requirements. Programme-participation and registry measures within ClimatePal EU's authority are governed by ClimatePal EU 101 Governance.

11.3 Re-Application Following Refusal or Withdrawal for a Critical Non-Conformity

Fixed waiting period

In accordance with Article 7(3) of Commission Implementing Regulation (EU) 2025/2358, an operator or group of operators refused certification because of a critical non-conformity may submit a new application only after the fixed waiting period determined by ClimatePal EU according to the characteristics of the applicable activity has elapsed. The fixed waiting period under ClimatePal EU is 12 months unless a different period is required by the applicable certification methodology or determined for the relevant activity in accordance with this clause. The waiting period shall start on the date on which the certification body notifies the operator or group of operators of the refusal decision.

Waiting period following withdrawal

The same waiting period shall apply where the operator's or group of operators' certificate was withdrawn under 11.2(b) because of a critical non-conformity. In

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this case, the waiting period shall start on the date on which the certification body notifies the operator or group of operators of the withdrawal decision.

Period determination and review criteria

For the purpose of determining and reviewing whether the fixed waiting period remains appropriate for the activities covered by this programme, as required by Article 7(3) of Commission Implementing Regulation (EU) 2025/2358, ClimatePal EU shall take into account:

a. the duration of a complete representative operating or land-management cycle;

b. the frequency and temporal variability of the data required by the applicable certification methodology;

c. the minimum period required to generate a new representative set of operational and monitoring evidence under the applicable certification methodology; and

d. the seasonality, storage or application timelines and other temporal characteristics of the activity relevant to a meaningful reassessment of conformity.

Current determination

Applying the criteria above, ClimatePal EU has determined 12 months as the default fixed waiting period for activities covered under ClimatePal EU. The period allows sufficient representative post-remediation evidence covering relevant operational, input, storage and monitoring characteristics, as applicable, to be generated and assessed and thereby enables a meaningful reassessment of the previous critical non-conformity.

Additional activities

Before an additional activity becomes applicable under ClimatePal EU, ClimatePal EU shall determine whether the default 12-month waiting period is appropriate for that activity or whether a different fixed waiting period is required, in accordance with the criteria above.

Approval and administration

The Governing Board shall approve the fixed waiting periods specified in this clause and any subsequent revision thereof, following a technical recommendation from the Technical Stakeholder Committee, in accordance with ClimatePal EU 101 Governance.

Waiting period administration

Operational Management shall apply the approved waiting period without case-by-case adjustment. Operational Management shall record the applicable start date and the earliest date on which a new application may be submitted and shall notify the operator or group of operators accordingly.

Re-application evidence

The new application shall include evidence that the critical non-conformity has been remediated and that measures have been implemented to prevent recurrence.

Effect and audit scope

Submission or acceptance of a new application does not constitute certification and does not create an entitlement to the issuance of certified units. Re-

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application does not reinstate a withdrawn certificate or entitlement to new unit issuance. The new certification audit shall cover the earlier critical finding and the effectiveness of the measures implemented to prevent recurrence.

12. Certified Units and Registry Interaction

Applicable registry

In accordance with Article 12(1) and (3) of Regulation (EU) 2024/3012, for the purposes of this clause, the applicable registry is the ClimatePal Registry. Once the Union Registry is established under Article 12 of Regulation (EU) 2024/3012, the ClimatePal Registry shall comply with and accommodate the specified processes and flows between the ClimatePal Registry and the Union Registry. The registry shall comply with the system-level governance and operating requirements specified in 10.1 of ClimatePal EU 101 Governance.

Registry minimum information

In accordance with Article 12(3) of Regulation (EU) 2024/3012, the applicable registry shall contain, at a minimum, all information specified in Annex III to Regulation (EU) 2024/3012, including the applicable information concerning operators or groups of operators and certified activities, certification documents and certified units. The detailed registry data fields, formats, responsibilities and identifiers shall be specified in Annex A ClimatePal Registry Data Specification.

Cross-scheme registration

In accordance with Article 16(1)(b) of Commission Implementing Regulation (EU) 2025/2358, the applicable registry shall prevent the registration of an activity that is already registered under another carbon removal or soil emission reduction certification scheme.

12.1 Basis for Issuance

Unit eligibility

In accordance with Article 9(3) and Article 12(4) of Regulation (EU) 2024/3012, certified units shall be issued only through the applicable registry and only for a net carbon removal benefit or net soil emission reduction benefit that has been generated, verified through a re-certification audit and documented in the applicable updated certificate of compliance. The relationship between re-certification and unit issuance is illustrated in Figure 1.

Prevention of double issuance

In accordance with Article 16(1)(c) of Commission Implementing Regulation (EU) 2025/2358, certified units shall not be issued for an activity and certification period where another certification scheme has issued certified units for the same activity and certification period, unless those units have been cancelled. In accordance with Article 12(4) of Regulation (EU) 2024/3012, a certified unit shall not be issued more than once and shall not be used by more than one natural or legal person at any point in time.

Verified results

Expected results validated through the certification audit shall not give entitlement to the issuance of certified units.

12.2 Unit Categories

Unit categories

In accordance with Article 12(4) of Regulation (EU) 2024/3012, certified units shall be recorded under one of the following categories, as applicable:

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a. permanent carbon removal units;

b. carbon farming sequestration units;

c. soil emission reduction units; and

d. carbon storage in product units.

Unit status and lifecycle

The applicable registry shall maintain a traceable status and transaction history for each certified unit and shall record its issuance, transfer, retirement, cancellation, expiry and correction. Each registry action shall be authorised and supported by evidence in accordance with this clause and Annex A.

Lifecycle actions

The following requirements shall apply to certified-unit lifecycle actions:

a. issuance shall be authorised by ClimatePal only where the conditions in 12.1 have been met. The authorisation shall be supported by the applicable updated certificate of compliance, the verified quantity of certified units and completion of the cross-scheme double-issuance control specified in A1.9;

b. transfer shall be initiated by the current registry account holder or an authorised registry user and shall proceed only where the current unit status permits transfer. The transfer instruction and the transaction information required by A1.8 shall constitute the supporting record;

c. retirement shall be initiated by the current registry account holder or an authorised registry user and shall identify the beneficiary and the purpose of retirement. Retirement shall be irreversible;

d. cancellation shall be authorised by ClimatePal or an authorised registry user, as applicable, and shall be supported by the purpose of cancellation and the applicable legal, methodology, remediation or other authorised basis. Cancellation shall be irreversible;

e. expiry shall be applied by the registry when the conditions in 12.3 are met, on the basis of the recorded monitoring-period end date and any applicable prolongation of the monitoring period. No separate discretionary authorisation of expiry shall be required; and

f. correction shall be authorised by ClimatePal where documented evidence demonstrates that registry information or a registry transaction is inaccurate or incomplete. The correction shall identify the original information, corrected information, reason and responsible party and shall preserve the complete audit trail. A correction shall not reverse a valid retirement or cancellation.

Retirement and cancellation

In accordance with Article 16(1)(d) and (e) of Commission Implementing Regulation (EU) 2025/2358, the applicable registry shall prevent a certified unit that has already been retired or cancelled from being retired or cancelled a

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second time. For every retirement or cancellation, the registry shall record the beneficiary and the purpose for which the unit was retired or cancelled.

Effect of certificate status

Suspension, withdrawal, termination or expiry of the originating certificate shall not by itself cancel certified units validly issued before the status change. Such validly issued units shall remain transferable unless their transfer is restricted by Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358, another applicable implementing or delegated act adopted under Regulation (EU) 2024/3012, the applicable certification methodology or a remediation measure relating to erroneous or fraudulent issuance. Such units shall be restricted, cancelled or replaced only where their issuance was erroneous or fraudulent or where Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358, another applicable implementing or delegated act adopted under Regulation (EU) 2024/3012, or the applicable certification methodology requires that action. No new certified units shall be issued while the conditions for valid issuance are not met.

Transfer integrity

A transfer shall not alter the unit category, status, monitoring period or link to the originating activity and updated certificate. A unit that is retired, cancelled or expired shall not be transferred or used.

12.3 Unit Expiry

Unit expiry

In accordance with Article 12(5) of Regulation (EU) 2024/3012, carbon farming sequestration units and carbon storage in product units shall expire at the end of the monitoring period of the relevant activity and shall be cancelled in the applicable registry, unless the long-term storage of the removed carbon is proven through continued monitoring in accordance with the applicable certification methodology. Where the monitoring period is prolonged through a new certification of the activity in accordance with Article 6(5) of Regulation (EU) 2024/3012, the validity of the relevant units shall be extended to the end of the prolonged monitoring period. Upon expiry, the units shall no longer be transferred or used.

12.4 Reversals and Liability Mechanisms

Reversal liability

In accordance with Article 6(2)(b), (4) and (6) of Regulation (EU) 2024/3012, an operator or group of operators shall address any reversal occurring during the monitoring period through the liability mechanism specified in the applicable certification methodology.

12.5 Erroneous or Fraudulent Issuance

Erroneous or fraudulent issuance

In accordance with Article 16(1)(f) and (g) of Commission Implementing Regulation (EU) 2025/2358, erroneous or fraudulent issuance of certified units shall be addressed through remediation measures that include at least suspension of the operator's account and, where relevant, compensation for excess issuance.

Excess issuance

Where erroneous or fraudulent excess issuance is identified, the corresponding number of certified units in the operator's account shall be cancelled. Where that

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cancellation is insufficient, the operator shall replace an equivalent number of certified units for immediate cancellation.

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Annex A. ClimatePal Registry Data Specification

This Annex specifies the minimum data, identifiers, responsibilities and data-management requirements for the ClimatePal Registry.

The requirements of this Annex apply to the ClimatePal Registry until the Union Registry established under Article 12 of Regulation (EU) 2024/3012 enters operation.

The registry shall contain and maintain, at a minimum, all information required by Annex III to Regulation (EU) 2024/3012 and the additional information necessary to implement the registry controls established in Clause 12 of this Certification Programme and Article 16 of Commission Implementing Regulation (EU) 2025/2358.

Additional data may be recorded where required by Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358, the applicable certification methodology, another controlled ClimatePal EU document or the technical operation of the registry.

A1. General Data Requirements

Registry information shall be complete, accurate, current, traceable and linked to the relevant operator or group of operators, activity, certification document and certified units.

Applicable mandatory information shall be recorded before the corresponding registry action is completed.

Changes and corrections to registry information shall be traceable. The registry shall retain an auditable record of the previous value, revised value, date of change and responsible user or system action.

The operator or group of operators shall provide the information assigned to it under this Annex and shall notify relevant changes without undue delay.

The appointed certification body shall verify and submit the certification-related information assigned to it in accordance with ClimatePal EU 202 Certification Body Requirements.

ClimatePal shall maintain the registry records, scheme-level information and registry transactions assigned to it and shall oversee completeness and consistency of the registry dataset in accordance with ClimatePal EU 101 Governance.

Automated registry controls may be used to validate data, maintain status information, restrict incompatible transactions and support traceability.

A2. Unique Identifiers and Data Linkage

ClimatePal shall assign or maintain, as applicable, unique identifiers sufficient to distinguish and link registry records.

The registry shall maintain at least:

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a. Operator ID or Group ID;

b. Activity ID;

c. Certification Period ID;

d. Certificate ID;

e. Audit Report ID;

f. Certified Unit ID, serial number or identifiable unit range; and

g. Transaction ID.

Registry records shall maintain traceable links between the relevant:

Operator or Group ID → Activity ID → Certification Period ID → Certificate ID → Audit Report ID → Certified Unit ID or unit range → Transaction ID.

Each certified unit shall remain traceable to the activity, certification period and updated certificate of compliance on which its issuance was based.

Certified units may be administered in identifiable batches or serial ranges provided that their quantity, origin, category, status and transaction history remain traceable.

A3. Minimum Information Concerning Operators and Activities

The minimum information required for operators and activities, together with the corresponding responsibilities for supplying, verifying and maintaining that information, is presented in Table 1.

Table 1: Minimum information concerning operators and activities

Ref.	Registry field	Requirement	Supplied by	Verified by	Maintained by
A3.1	Operator or group name	Legal or registered name of the operator or group of operators	Operator/group	Certification body	ClimatePal
A3.2	Operator or group contact information	Contact information required for the registry record	Operator/group	Certification body	ClimatePal
A3.3	Operator ID / Group ID	Unique ClimatePal EU identifier	—	ClimatePal EU	ClimatePal
A3.4	Activity name	Controlled name of the certified activity	Operator/group	Certification body	ClimatePal
A3.5	Activity type	Applicable activity type under Regulation (EU) 2024/3012 and the applicable certification methodology	Operator/group	Certification body	ClimatePal
A3.6	Activity ID	Unique ClimatePal EU activity identifier	—	ClimatePal EU	ClimatePal
A3.7	Activity location	Geographic location of the activity	Operator/group	Certification body	ClimatePal

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Ref.	Registry field	Requirement	Supplied by	Verified by	Maintained by
A3.8	Activity boundaries	Geographically explicit boundaries meeting the applicable 1:5 000 mapping-scale requirement for the Member State	Operator/group	Certification body	ClimatePal
A3.9	Activity-period start date	Start date of the activity period	Operator/group	Certification body	ClimatePal
A3.10	Activity-period end date	End date of the activity period	Operator/group	Certification body	ClimatePal
A3.11	Applicable certification methodology	Title, version and legal reference of the applicable certification methodology	Operator/group	Certification body	ClimatePal
A3.12	Applicable methodology version	Version applicable to the relevant certification period, where applicable	—	Certification body	ClimatePal

A4. Scheme-level Information

The registry shall provide or maintain a traceable reference or link to the following current scheme-level information:

a. the name of the certification scheme;

b. the European Commission decision recognising ClimatePal EU;

c. the applicable ClimatePal EU scheme rules and procedures;

d. the current list and status of appointed certification bodies; and

e. the annual operation reports required under Article 14 of Regulation (EU) 2024/3012.

Scheme-level information may be maintained as a controlled common record and linked to individual activity and unit records rather than reproduced separately for each activity or certified unit.

ClimatePal EU shall be responsible for maintaining this information.

A5. Certified Benefit and Sustainability Information

For each certification period for which results have been verified, the registry shall record, as applicable:

a. the permanent net carbon removal benefit;

b. the temporary net carbon removal benefit generated by carbon farming sequestration;

c. the net soil emission reduction benefit;

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d. the temporary net carbon removal benefit generated by carbon storage in products; and

e. the sustainability co-benefits determined in accordance with Article 7 of Regulation (EU) 2024/3012 and the applicable certification methodology.

The quantified benefit shall be recorded in the applicable unit of tonnes of CO_2 equivalent and linked to the corresponding activity, certification period, re-certification audit report and updated certificate of compliance.

A6. Certification Information

For each certified activity, the registry shall record and maintain at least:

a. the current certification status;

b. the Certificate ID;

c. the certificate of compliance;

d. the date of issue and validity information of the certificate of compliance;

e. the certification audit report or the publicly available version thereof;

f. each updated certificate of compliance;

g. each re-certification audit report or the publicly available version thereof;

h. the appointed certification body;

i. the relevant certification period; and

j. the relationship between the certification documents and the activity to which they apply.

Certification status terminology shall be applied consistently with ClimatePal EU 110 Glossary.

Changes to certification status shall be reflected in the registry without undue delay.

A7. Certified unit Information

For each certified unit or identifiable unit range, the registry shall record at least:

a. the Certified Unit ID or identifiable serial range;

b. the originating Activity ID;

c. the relevant Certification Period ID;

d. the originating updated Certificate ID;

e. the unit category;

f. the quantity of certified units;

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g. the date of issuance;

h. the current unit status;

i. the monitoring-period end date and applicable expiry date, where relevant;

j. the end-use of the certified unit, where the unit is used;

k. the entity that uses the certified unit;

l. the transaction history; and

m. any applicable restriction or corrective status.

Certified units shall be identified as one of the following, as applicable:

a. permanent carbon removal units;

b. carbon farming sequestration units;

c. soil emission reduction units; or

d. carbon storage in products units.

The registry shall maintain a controlled status for each certified unit, including, as applicable:

a. issued;

b. allocated to a buffer;

c. retired;

d. cancelled; or

e. expired.

Transfer and correction shall be recorded as registry transactions and shall not remove the historical status and transaction record of the certified unit.

A8. Registry Transactions

Each issuance, transfer, retirement, cancellation, expiry, correction or other registry action affecting a certified unit shall be recorded with at least:

a. Transaction ID;

b. Certified Unit ID or unit range;

c. transaction type;

d. quantity affected;

e. date and time of the transaction;

f. previous status;

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g. resulting status;

h. originating account;

i. receiving account, where applicable;

j. user or system responsible for the transaction; and

k. supporting reference or reason, where applicable.

For each retirement, the registry shall record the beneficiary on whose behalf the certified unit is retired and the purpose of the retirement.

For each cancellation, the registry shall record the purpose of the cancellation and the relevant operator, account or other entity associated with the cancellation.

A certified unit that has been retired or cancelled shall not be retired or cancelled again.

A retired, cancelled or expired unit shall not be transferred or used.

A9. Cross-scheme Double-counting Controls

Before an activity is registered, ClimatePal EU shall determine whether the activity is registered under another carbon removal or soil emission reduction certification scheme.

The registry shall maintain evidence of the check, including:

a. the date of the check;

b. the result;

c. the other certification scheme identified, where applicable; and

d. the supporting evidence or reference.

An activity that is registered under another carbon removal or soil emission reduction certification scheme shall not be registered under ClimatePal EU.

Before certified units are issued, ClimatePal EU shall determine whether another certification scheme has issued certified units for the same activity and certification period.The registry shall maintain:

a. the date of the check;

b. the certification period checked;

c. the result;

d. the other certification scheme identified, where applicable;

e. the quantity and status of units identified under the other scheme; and

f. evidence that such units have been cancelled, where issuance under ClimatePal EU may proceed only following their cancellation.

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Certified units shall not be issued under ClimatePal EU for an activity and certification period where another certification scheme has issued certified units for the same activity and certification period and those units have not been cancelled.

A10. Retirement, Cancellation and Use Controls

The registry shall prevent:

a. a retired unit from being retired or cancelled again;

b. a cancelled unit from being retired or cancelled again;

c. a retired, cancelled or expired unit from being transferred or used; and

d. any transaction that is incompatible with the current status of the certified unit.

For each retirement or cancellation, the registry shall retain the information required under A1.8 and the corresponding transaction record.

Where a certified unit is retired, the beneficiary and purpose of the retirement shall be mandatory registry information.

Where a certified unit is cancelled, the purpose of cancellation and the associated operator, account or entity shall be mandatory registry information.

A11. Certificate Status and Unit Transferability

Suspension, withdrawal, termination or expiry of the originating certificate shall be reflected in the certification record without undue delay.

Certified units validly issued before such a status change shall not be cancelled solely because of the status change.

Where such units remain transferable under Clause 12.2, the registry shall retain their existing unit status unless a restriction is required by Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358, the applicable certification methodology or a remediation measure relating to erroneous or fraudulent issuance.

Where a transfer restriction applies, the registry shall record:

a. the affected certified units;

b. the restriction status;

c. the reason for the restriction;

d. the legal, methodology or remediation basis; and

e. the date on which the restriction was imposed and, where applicable, lifted.

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A12. Expiry and Monitoring Period Information

For carbon farming sequestration units and carbon storage in products units, the registry shall record:

a. the applicable monitoring period;

b. the monitoring-period start date;

c. the monitoring-period end date;

d. the applicable unit-expiry date; and

e. any prolongation of the monitoring period.

Where the monitoring period is prolonged in accordance with the applicable certification methodology, the registry shall update the monitoring-period information and corresponding validity or expiry information of the affected certified units.

Upon expiry, the unit status shall be updated accordingly, and the unit shall no longer be transferable or usable.

A13. Erroneous or Fraudulent Issuance

Where erroneous or fraudulent issuance is identified, the registry shall record at least:

a. the Operator ID or Group ID concerned;

b. the Activity ID;

c. the affected Certified Unit IDs or unit ranges;

d. the quantity of affected units;

e. the nature and reason for the erroneous or fraudulent issuance;

f. the date of identification;

g. the operator-account status;

h. the date and reason for account suspension;

i. the remediation measure applied;

j. the number of units cancelled from the operator's account;

k. where applicable, the number of replacement units provided by the operator and immediately cancelled;

l. the date on which remediation was completed; and

m. the supporting decision and evidence.

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The registry shall maintain traceability between the erroneous or fraudulent issuance, the affected certified units and all corrective transactions.

A14. Data Submission and Verification Responsibilities

The general allocation of responsibilities presented in Table 2 shall apply unless a more specific requirement is established in the applicable certification methodology or another controlled ClimatePal EU document:

Table 2: General allocation of responsibilities for data submission and verification

Information	Primary supplier	Verification	Registry maintenance
Operator and group information	Operator/group	Certification body	ClimatePal
Activity information and boundaries	Operator/group	Certification body	ClimatePal
Activity-period information	Operator/group	Certification body	ClimatePal
Applicable methodology	Operator/group / certification body	Certification body	ClimatePal
Quantified certified benefit	Certification body, based on verified results	Certification body	ClimatePal
Sustainability co-benefits	Operator/group	Certification body	ClimatePal
Audit reports	Certification body	Certification body / ClimatePal EU review as applicable	ClimatePal
Certificates of compliance and updated certificates	Certification body	Certification body / ClimatePal EU review as applicable	ClimatePal
Scheme-level information	ClimatePal EU	ClimatePal EU	ClimatePal
Certified-unit issuance	—	ClimatePal Registry control based on valid updated certificate	ClimatePal
Transfer information	Registry account holder / registry transaction	Registry control	ClimatePal
Retirement information	Registry account holder / beneficiary information	Registry control	ClimatePal
Cancellation information	ClimatePal or authorised registry user, as applicable	Registry control	ClimatePal
Expiry information	Applicable methodology / registry record	Registry control	ClimatePal
Correction information	ClimatePal EU	Registry control	ClimatePal
Cross-scheme checks	Operator/group and ClimatePal EU	ClimatePal EU	ClimatePal
Erroneous/fraudulent issuance and remediation	ClimatePal EU	ClimatePal EU	ClimatePal

Submission of registry information by a certification body shall not transfer responsibility for governance, operation or oversight of the registry to the certification body.

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A15. Publication and Access

The information required by Annex III to Regulation (EU) 2024/3012 shall be made publicly accessible through the applicable registry in accordance with Article 12 of that Regulation.

Publication of certification and re-certification audit reports and the treatment of commercially sensitive information shall comply with Clause 8.7 of this Certification Programme and ClimatePal EU 101 Governance.

Internal control information, system logs, security information and remediation evidence need not be publicly disclosed unless publication is required by Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358, this Certification Programme or another applicable ClimatePal EU requirement.

Registry access and publication shall comply with applicable data-protection requirements.

A16. Data Maintenance and Correction

Registry information shall be reviewed and updated when:

a. operator or group information changes;

b. activity information or boundaries change;

c. the applicable certification methodology or certification scope changes;

d. a certification, re-certification or monitoring audit results in information relevant to the registry;

e. certification status changes;

f. certified units are issued, transferred, retired, cancelled, expire or are corrected;

g. the monitoring period is prolonged;

h. erroneous or fraudulent issuance is identified or remediated; or

i. another change affects the accuracy or traceability of registry information.

Corrections shall not erase the original registry record. The previous information and the reason, date and responsible party for the correction shall remain auditable.

A17. Transition to the Union Registry

When the Union Registry established under Article 12 of Regulation (EU) 2024/3012 becomes applicable, ClimatePal EU shall ensure that the information required under this Annex is transferred, synchronised or otherwise made

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available in accordance with the requirements applicable to the Union Registry under Regulation (EU) 2024/3012 and any implementing acts adopted pursuant to that Regulation.

ClimatePal EU shall maintain the traceability and integrity of historical registry records during the transition.

Where Union Registry requirements supersede a technical requirement of this Annex, ClimatePal EU shall update this Annex and the corresponding registry procedures accordingly.

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