ClimatePal EU 202 CERTIFICATION BODY REQUIREMENTS

Version 1.0

ClimatePal
by ISCC



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Table of Abbreviations

Abbreviation	Name
CB	certification body
CRCF	Carbon Removals and Carbon Farming
DAkkS	Deutsche Akkreditierungsstelle GmbH (German national accreditation body)
EN	European Standard
EU	European Union
GHG	greenhouse gas
ISO	International Organization for Standardization
ISO/IEC	International Organization for Standardization / International Electrotechnical Commission
NAB	national accreditation body
V/V	validation and verification

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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.

Applicable scheme documents

The requirements combine the applicable Carbon Removal and Carbon Farming (CRCF) Regulation with the conformity-assessment requirements relevant to certification bodies. They shall be applied together with the ClimatePal EU 101 Governance, ClimatePal EU 201 Certification Programme, ClimatePal EU 110 Glossary, the applicable ClimatePal EU certification methodology and the other normative references identified in Clause 2.

Document structure

This document follows the structure of EN ISO/IEC 17065:2012. Requirements already established by that standard are incorporated by reference, while CRCF- and ClimatePal EU-specific requirements are identified as additional requirements.

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1. Scope

1.1 Application

Certification Body scope

This document specifies the requirements applicable to certification bodies appointed by the ClimatePal EU scheme to carry out certification audits (validation), re-certification audits and monitoring audits (verification) in accordance with Regulation (EU) 2024/3012, Articles 9–10 and Commission Implementing Regulation (EU) 2025/2358, Articles 10–15).

Organisational applicability

The requirements apply to all legal entities, organisational units, locations, personnel, committees, contractors and external resources involved in certification activities on behalf of the ClimatePal EU scheme.

1.2 Relationship with ISO/IEC 17065

Hierarchy

The certification body shall comply with the requirements applicable to its accreditation or recognition route under Clause section4.1.1.2. Under the accreditation route, EN ISO/IEC 17065:2012 shall be the accreditation basis. Under the recognition route, the certification body shall comply with the applicable requirements and conditions established by the recognising national competent authority.

Usage of ISO norms

Where the certification body performs verification using internal resources or resources under its direct control, the applicable requirements of ISO/IEC 17029:2019 and EN ISO 14065:2021 shall supplement ISO/IEC 17065:2012. EN ISO 14065:2021 is the environmental-information sector application of ISO/IEC 17029:2019; neither standard replaces the certification functions, independent review or certification decision required by ISO/IEC 17065:2012 (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 13(2)). Audit-team selection and audit conduct shall also follow ISO/IEC 17021-1:2015 and ISO 19011:2026, as applicable (in accordance with Commission Implementing Regulation (EU) 2025/2358, Articles 10(3) and 13(4)).

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Note: Compliance with EN ISO/IEC 17065:2012 is a prerequisite for certification bodies. Accordingly, this document follows the structure of EN ISO/IEC 17065:2012. Each relevant clause is referenced using the wording "See X.X.X in EN ISO/IEC 17065:2012.", indicating that the corresponding EN ISO/IEC EN 17065:2012 requirements apply in full. Requirements that go beyond EN ISO/IEC 17065:2012 are marked "[additional]". Clauses that are additional to the EN ISO/IEC 17065:2012 structure are also identified by "[additional][additional]" in the clause title.

EN ISO/IEC 17029:2019 and EN ISO 14065:2021 apply as specified in Clause 1.2. Where requirements arise from the Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358 the accordance is specified in brackets.

Event of conflict

In the event of a conflict:

a. applicable Union or national law shall prevail;
b. the applicable CRCF certification methodology shall prevail over a general ClimatePal EU requirement in relation to the activity covered by that methodology;
c. accreditation requirements, ClimatePal EU 201 Certification Programme and these ClimatePal EU 202 Certification Body Requirements shall apply cumulatively; and
d. no ClimatePal EU requirement shall reduce a requirement of ISO/IEC 17065:2012, the competent national accreditation body or applicable law.

2. Normative References

See 2 in EN ISO/IEC 17065:2012.

Normative frameworks

[additional] The following documents are normative for the application of this document. For undated references, the latest edition of the referenced document, including any amendments, applies. The following documents are referred to in this document in such a way that some or all of their content constitutes requirements of ClimatePal EU:

2.1 EU Legislation

a. Regulation (EC) No 765/2008 setting out the requirements for accreditation and market surveillance

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

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

d. the applicable certification methodology adopted pursuant to Article 8 of Regulation (EU) 2024/3012

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 17021-1:2015, as applicable to audit-team selection, audit planning and audit conduct

c. EN ISO 19011:2026, as applicable to auditing principles and audit conduct

d. EN ISO/IEC 17029:2019, where validation or verification activities fall within its scope

e. EN ISO 14065:2021, where greenhouse-gas validation or verification activities fall within its scope

f. EN ISO/IEC 17025:2017, where testing is used as an evaluation activity

g. EN ISO/IEC 17020:2026, where inspection is used as an evaluation activity

2.3 ClimatePal EU Normative Documents

a. ClimatePal EU 101 Governance

b. ClimatePal EU 110 Glossary

c. ClimatePal EU 201 Certification Programme

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

3. Terms and Definitions and Verbal Forms

See 3 in EN ISO/IEC 17065:2012. For validation and verification terminology, see also 3 in EN ISO/IEC 17029:2019, and 3 in EN ISO 14065:2021, as applicable.

Terms and definitions

[additional] 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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Terminology consistency

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. General Requirements for Certification Bodies

4.1 Legal and Contractual Matters

4.1.1 Legal Responsibility

4.1.1.1 Legal Entity

See 4.1.1 in EN ISO/IEC 17065:2012 and note. For verification functions, see also 5.1–5.2 in EN ISO/IEC 17029:2019, and 5.1–5.2 in EN ISO 14065:2021.

Legal matters

[additional] The certification body shall retain legal and operational responsibility for activities performed by its personnel, committees, contractors, technical experts and external resources.

4.1.1.2 Accreditation [additional]

Accreditation prerequisites

Before appointment by ClimatePal EU, the certification body shall meet one of the following requirements:

Recognition route

a. Recognition route: the certification body shall be recognised by a national competent authority pursuant to Article 10(1) of Regulation (EU) 2024/3012 and in accordance with the applicable conditions of Article 13 of Commission Implementing Regulation (EU) 2025/2358. Its recognition shall cover the auditing activities performed under the ClimatePal EU scheme and the applicable CRCF activity or activity category. The certification body shall comply with the conditions and decisions of the recognising national competent authority and shall maintain valid recognition throughout the period in which it performs ClimatePal EU certification activities; or

Accreditation route

b. Accreditation route: the certification body shall be accredited in accordance with EN ISO/IEC 17065:2012 by a national accreditation body operating in accordance with Regulation (EC) No 765/2008. Its accreditation scope shall cover the ClimatePal EU scheme and the applicable CRCF activity or activity category. The certification body shall comply with the conditions, decisions

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and rules of its national accreditation body and shall maintain valid accreditation throughout the period in which it performs ClimatePal EU certification activities.

Scope determination

The scope and technical subdivision of the accreditation or recognition shall be determined by the relevant national accreditation body or recognising national competent authority, as applicable.

4.1.1.3 Appointment [additional]

Appointment prerequisites

Before performing certification activities, the certification body shall conclude a legally enforceable Cooperation Agreement with ClimatePal EU (in accordance with Regulation (EU) 2024/3012, Articles 9(2) and 10, and Commission Implementing Regulation (EU) 2025/2358, Article 13).

Permitted certification scope

The certification body shall perform certification activities only:

a. within the scope of its valid accreditation or recognition;
b. within the technical scope approved by ClimatePal EU;
c. using personnel authorised for the relevant CRCF activity and certification methodology; and
d. while its ClimatePal EU appointment remains valid.

Scope representation

The certification body shall not represent itself as appointed, accredited or recognised for any activity outside its approved scope.

4.1.1.4 Changes Affecting Entitlement [additional]

Rules on handling changes

The certification body shall inform ClimatePal EU without undue delay of any change affecting (in accordance with Regulation (EU) 2024/3012, Article 10; Commission Implementing Regulation (EU) 2025/2358, Articles 13 and 15):

a. its legal status, ownership or organisational control;
b. its accreditation or recognition status or accreditation scope;
c. its appointment or authorisation by another relevant body;
d. its competence or available resources;
e. its independence or impartiality;
f. its insurance or financial stability;
g. key certification personnel;
h. external evaluation resources; or
i. its ability to comply with these ClimatePal EU 202 Certification Body Requirements.

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Where the relevant accreditation, recognition or appointment is suspended, reduced, withdrawn, terminated or expires, the certification body shall immediately cease the affected certification activities.

Cessation after status loss

This clause addresses changes arising after appointment; the initial eligibility and appointment conditions are specified in Clause 4.1.1.2 and 4.1.1.3.

Post appointment changes

4.1.2 Certification Agreement

4.1.2.1 General Agreement Rules

See 4.1.2.1 in EN ISO/IEC 17065:2012.

[additional] Before commencing certification activities, the certification body shall conclude a legally enforceable certification agreement with the operator or group of operators. The agreement may consist of more than one document, provided that the combined documents constitute a legally enforceable arrangement and clearly allocate the rights and obligations of the parties.

Certification agreement

4.1.2.2 Obligations to be Imposed on the Operator

See 4.1.2.2 in EN ISO/IEC 17065:2012 and notes.

[additional] The certification body shall ensure that the certification agreement requires the operator or group of operators to (in accordance with Regulation (EU) 2024/3012, Articles 9(1), 9(4) and 10(4) and Commission Implementing Regulation (EU) 2025/2358, Articles 8, 10(5), 11 and 15):

Operator responsibilities

a. accept responsibility for the completeness, accuracy and integrity of information submitted for certification;

b. provide the activity plan, monitoring plan, monitoring reports, calculations, datasets, records and other evidence required for evaluation;

c. retain the evidence required under the Carbon Removals and Carbon Farming (CRCF) Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358, for at least five years after the end of the monitoring period, or longer where required by national law or the applicable certification methodology;

d. provide access to relevant land parcels, premises, installations, storage locations, equipment, personnel, contractors, subcontractors, data systems and records;

e. permit the participation of technical experts, observers and representatives of ClimatePal EU, the national accreditation body, competent national authorities and the European Commission, where applicable;

f. disclose current or previous participation in other carbon removal certification schemes and provide the information required under Article 8 of Commission Implementing Regulation (EU) 2025/2358; and

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g. use certificates, certification statements, logos and marks only in accordance with the requirements of the certification body and ClimatePal EU.

4.1.2.3 Change or Loss of Accreditation, Recognition or Appointment [additional]

Provisions of certification agreement

The certification agreement shall establish the consequences of suspension, reduction, withdrawal, termination or expiry of the certification body's accreditation, recognition or ClimatePal EU appointment. The provisions shall enable the certification body to:

a. prevent continued unauthorised use of affected certificates and certification claims;

b. notify the affected operator and ClimatePal EU;

c. arrange the orderly transfer or termination of certification, where permitted;

d. make certification files available to a successor certification body, subject to applicable confidentiality requirements; and

e. retain records for the required retention period.

4.1.3 Use of Licences, Certificates and Marks of Conformity

See 4.1.3.1-4.1.3.2 in EN ISO/IEC 17065:2012 and notes

Rules on licenses and certificates

[additional] The certification body shall exercise the control over:

a. certificates of compliance and updated certificates of compliance;

b. references to ClimatePal EU certification;

c. use of the certification body's name and logo;

d. use of the ClimatePal EU name and mark;

e. use of the accreditation symbol;

f. other statements implying certification, accreditation or recognition.

Misuse escalation

For each incorrect, misleading or unauthorised use, the certification body shall document the nature, scope, duration, recurrence and materiality of the misuse and apply the following minimum escalation:

a. require correction or cessation within a defined timeframe and verify completion;

b. where misuse is deliberate, repeated, materially misleading or not corrected, suspend or withdraw the certificate of compliance as applicable;

c. notify ClimatePal and correct affected public or registry information; and

d. take further legal or public corrective action where necessary and legally permissible.

Registry-only unit issuance

The certification body shall not issue CRCF certified units. Certified units shall be issued only by the ClimatePal Registry or the Union Registry based on a valid updated

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certificate of compliance (in accordance with Regulation (EU) 2024/3012, Articles 9(3) and 12(4)).

4.2 Management of Impartiality

4.2.1 Impartiality Conduct

See 4.2.1 in EN ISO/IEC 17065:2012. For validation and verification activities, see also 5.3 in EN ISO/IEC 17029:2019 and 5.3 in EN ISO 14065:2021.

Impartialities

[additional] The certification body shall be (in accordance with Regulation (EU) 2024/3012, Article 10(2)– (3)):

a. legally and financially independent of the operator or group of operators;

b. competent to perform the assigned certification activities; and

c. capable of carrying out its CRCF functions in the public interest.

4.2.2 Responsibility for Impartiality

See 4.2.2 in EN ISO/IEC 17065:2012. For validation and verification activities, see also 5.3 in EN ISO/IEC 17029:2019, and 5.3 in EN ISO 14065:2021.

Outcome independent remuneration

[additional] Fees, remuneration, commissions and performance assessments shall not depend on:

a. a positive certification outcome;

b. the absence of non-conformities;

c. the quantity of carbon removals, soil emission reductions or certified units; or

d. continuation of the operator's certification.

4.2.3 Identification of Impartiality Risks

See 4.2.3 in EN ISO/IEC 17065:2012 and notes. See 5.3 in EN ISO/IEC 17029:2019 and 5.3 in EN ISO 14065:2021.

4.2.4 Treatment of Impartiality Risks

See 4.2.4 in EN ISO/IEC 17065:2012. See 5.3 in EN ISO/IEC 17029:2019 and 5.3 in EN ISO 14065:2021.

Impartiality safeguards

[additional] Controls shall be proportionate to the significance of the risk and may include:

a. exclusion of personnel;

b. separation of functions;

c. independent review;

d. reassignment or rotation;

e. additional oversight;

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f. termination of the conflicting relationship; or

g. refusal of the certification assignment.

Residual-risk acceptance

A risk shall be considered adequately controlled only where prohibited relationships are absent, the required safeguards are implemented before assignment, the residual risk is within documented acceptance criteria, and the decision and rationale are approved by the certification body's designated impartiality function. If any of these conditions is not met, the certification body shall not undertake or continue the affected certification activity.

4.2.5 Top-Management Commitment

See 4.2.5 in EN ISO/IEC 17065:2012. See 5.3.5 in EN ISO/IEC 17029:2019.

4.2.6 Prohibited Activities

See 4.2.6 in EN ISO/IEC 17065:2012 and notes. For validation and verification activities, see also 5.3 in EN ISO/IEC 17029:2019 and 5.3 in EN ISO 14065:2021.

Independence restrictions

[additional] The certification body, any part of the same legal entity and any entity under its organisational control shall not:

a. be an operator or group of operators;

b. own or control an operator or group of operators;

c. be owned or controlled by an operator or group of operators;

d. prepare an operator's activity plan, monitoring plan or monitoring report;

e. perform the operator's quantification, additionality assessment, baseline determination or GHG calculations;

f. design the operator's monitoring, sustainability or liability arrangements;

g. provide consultancy within the field of conformity assessment in which it acts as an independent third-party certification body; or

h. provide internal auditing to an operator where the audited system forms part of the certification evaluation.

Ownership

Ownership and relationship restrictions are based on Regulation (EU) 2024/3012, Article 10(3).

4.2.7 Separate Legal Entities

See 4.2.7 in EN ISO/IEC 17065:2012 and note.

4.2.8 Related Provision of Activities or Consultancy

See 4.2.8 in EN ISO/IEC 17065:2012 and note.

4.2.9 Marketing and Referral Arrangements

See 4.2.9 in EN ISO/IEC 17065:2012.

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4.2.10 Personnel Separation, Cooling-Off Periods and Rotation

See 4.2.10 in EN ISO/IEC 17065:2012 and notes. See 5.3 in EN ISO/IEC 17029:2019 and 5.3 in EN ISO 14065:2021.

Rules for personnel

[additional] Auditors shall be independent of the activity audited and free from actual, potential or perceived conflicts of interest (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 13(5)– (6)).

Cooling-off period

An auditor shall not be assigned to an operator to which that auditor provided consultancy during the preceding three years (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 13(5)).

Self-review safeguards

Where the certification body conducts both validation and subsequent verification for the same operator or activity, it shall identify and manage threats arising from self-review and familiarity. The safeguards applied shall be documented and shall address personnel assignment, technical review and certification decision-making.

Auditor rotation

The certification body shall maintain a documented auditor-rotation procedure or equivalent safeguards. The procedure shall define:

a. maximum number of consecutive audits or assignments by the same lead auditor;

b. triggers for earlier rotation based on familiarity risk, complaints, significant findings or material changes in activity complexity;

c. any cooling-off period before reassignment;

d. approval and additional review requirements for justified exceptions; and

e. records demonstrating application of the rule.

Equivalent safeguards

Any equivalent safeguard shall provide a demonstrably comparable reduction of familiarity risk (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 13(6)).

4.2.11 Risks Arising from other Persons or Organisations

See 4.2.11 in EN ISO/IEC 17065:2012.

4.2.12 Disclosure of Conflicts of Interest

See 4.2.12 in EN ISO/IEC 17065:2012. For validation and verification activities, see also 5.3 in EN ISO/IEC 17029:2019 and 5.3 in EN ISO 14065:2021.

Conflict of interest

[additional] The certification body shall evaluate each disclosure before authorising the person to undertake the relevant function within the certification process.

Assignment conflict checks

Before each assignment, the certification body shall obtain and evaluate a conflict-of-interest declaration from each auditor, technical expert, technical reviewer and certification decision-maker. The evaluation shall cover relevant employment, financial, business, consultancy and personal relationships and shall be completed

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before authorisation for the function. The certification body shall also monitor financial-dependence risks, including revenue concentration from a single operator or related group, against documented internal thresholds and escalation criteria. Auditors shall be independent with a three-year consultancy separation for auditors and rotation or equivalent good practice (in accordance with Regulation (EU) 2024/3012, Article 10(2)– (3) and Commission Implementing Regulation (EU) 2025/2358, Article 13(5)– (6)).

4.3 Liability and Financing

4.3.1 Liability

See 4.3.1 in EN ISO/IEC 17065:2012. For validation and verification activities, see also 5.4 in EN ISO/IEC 17029:2019.

Rules on liability

[additional] The certification body shall maintain documented evidence that its liability arrangements are adequate for its ClimatePal EU activities. The documented assessment shall address at least:

a. the certification scope;

b. the geographical area of operation;

c. the scale and complexity of certified activities;

d. the potential consequences of an incorrect certification decision;

e. reasonably foreseeable financial loss;

f. contractual liabilities or penalties; and

g. the activities of internal personnel, contractors, technical experts and external resources.

Liability review triggers

The assessment shall be reviewed when the certification scope, organisational structure, risk exposure or insurance arrangements change.

4.3.2 Financial Stability

See 4.3.2 in EN ISO/IEC 17065:2012.

4.4 Non-Discriminatory Conditions

4.4.1 Policies and Procedures

See 4.4.1 in EN ISO/IEC 17065:2012.

4.4.2 Access to Certification

See 4.4.2 in EN ISO/IEC 17065:2012.

4.4.3 Conditions of Access

See 4.4.3 in EN ISO/IEC 17065:2012 and notes.

4.4.4 Limitations to Relevant Matters

See 4.4.4 in EN ISO/IEC 17065:2012.

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4.5 Confidentiality

4.5.1 Protection of Information

See 4.5.1 in EN ISO/IEC 17065:2012. For validation and verification activities, see also 10.4 in EN ISO/IEC 17029:2019.

Rules on confidentiality

[additional] Information shall be treated as confidential unless it (in accordance with Regulation (EU) 2024/3012, Articles 9(2)–(3), 10(4) and 12 and Commission Implementing Regulation (EU) 2025/2358, Articles 5, 9, 15 and 16):

a. has been made public by the operator;

b. is required to be published under the Carbon Removals and Carbon Farming (CRCF) Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358;

c. is required for the ClimatePal Registry or Union Registry; or

d. is required for accreditation, supervision or enforcement.

4.5.2 Required Disclosure

See 4.5.2 in EN ISO/IEC 17065:2012.

4.5.3 Information from Third Parties

See 4.5.3 in EN ISO/IEC 17065:2012.

4.6 Publicly Available Information

See 4.6 in EN ISO/IEC 17065:2012. For validation and verification activities, see also 10.1–10.3 in EN ISO/IEC 17029:2019 and 10.1–10.3 in EN ISO 14065:2021.

Use of publicly available information

[additional] Use of names, marks and certification claims is governed by Clause 4.1.3 and the certification agreement; it is not repeated in this clause. Transition requirements for revised certification criteria are specified in Clause 7.10.1.

Public impartiality statement

The certification body shall make publicly available a statement confirming:

a. the importance of impartiality in its ClimatePal EU certification activities;

b. its commitment to the management of conflicts of interest; and

c. its commitment to objective evaluation, review and certification decision-making.

5. Structural Requirements for Certification Bodies

5.1 Organisational Structure and Top Management

5.1.1 Safeguarding Impartiality

See 5.1.1 in EN ISO/IEC 17065:2012. For validation and verification activities, see also 6.1 in EN ISO/IEC 17029:2019.

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5.1.2 Documented Structure

See 5.1.2 in EN ISO/IEC 17065:2012. For validation and verification activities, see also 6.1 in EN ISO/IEC 17029:2019.

5.1.3 Responsibilities of Top Management

See 5.1.3 in EN ISO/IEC 17065:2012. For validation and verification activities, see also 6.1 in EN ISO/IEC 17029:2019.

5.1.4 Committees

See 5.1.4 in EN ISO/IEC 17065:2012.

5.1.5 Operational Control [additional]

Control of related entities

The certification body shall maintain effective control over ClimatePal EU certification activities performed by branch offices, partnerships, agents, franchisees or other entities under its operational control, irrespective of their legal status, relationship or geographical location (in accordance with 6.2 in ISO/IEC 17029:2019).

Risk-based operational controls

The certification body shall determine and document the level and method of control based on risks to competence, consistent operation and impartiality. The controls shall address, as applicable:

a. certification processes;

b. approved technical scopes;

c. personnel competence and authorisation;

d. management and reporting lines;

e. access to operations and records;

f. use of controlled documents and systems; and

g. monitoring of performance.

5.2 Mechanism for Safeguarding Impartiality

5.2.1 Establishment and Functions

See 5.2.1 in EN ISO/IEC 17065:2012 and notes.

5.2.2 Balanced Representation

See 5.2.2 in EN ISO/IEC 17065:2012.

5.2.3 Independent Action

See 5.2.3 in EN ISO/IEC 17065:2012.

5.2.4 Identification of Interested Parties

See 5.2.4 in EN ISO/IEC 17065:2012.

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6. Resource Requirements for Certification Bodies

6.1 Certification Body Personnel

6.1.1 General Certification Body Personnel Requirements

6.1.1.1 Availability of Personnel

See 6.1.1.1 in EN ISO/IEC 17065:2012 and note.

6.1.1.2 Competence of Personnel

See 6.1.1.2 in EN ISO/IEC 17065:2012 and note. For validation and verification personnel, see also 7.2–7.3 in EN ISO/IEC 17029:2019 and 7.2–7.3 in EN ISO 14065:2021.

Specific rules on personnel

[additional] In accordance with Commission Implementing Regulation (EU) 2025/2358, Articles 13(4)– (5) Personnel shall be competent for the functions assigned to them, including:

a. audit planning;

b. validation and verification;

c. technical review;

d. certification decision-making;

e. certificate-status management;

f. complaints and appeals;

g. registry-information verification; and

h. knowledge of and ability to apply Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358 and the relevant CRCF certification methodology.

6.1.1.3 Access to Current Instructions and Information

See 6.1.1.3 in EN ISO/IEC 17065:2012.

6.1.1.4 Audit Team Appointment [additional]

Audit-team prerequisites

The certification body shall select and appoint the audit team in accordance with 7.2 and 9.2 from ISO/IEC 17021-1:2015 together with 6 and 7 from ISO 19011:2026, as applicable (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 13(4)).

Collective team competence

The audit team shall collectively possess the knowledge, experience, skills and capacity necessary to achieve the objectives of the audit.

Single-auditor competence

Where one auditor conducts the audit, that auditor shall also fulfil the applicable competence requirements of an audit-team leader.

Technical-expert supervision

Technical experts may support the audit team but shall operate under the direction and responsibility of a competent auditor.

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6.1.2 Management of Competence for Personnel Involved in the Certification Process

6.1.2.1 Competence Criteria

See 6.1.2.1 in EN ISO/IEC 17065:2012. For validation and verification personnel, see also 7.3 in EN ISO/IEC 17029:2019 and 7.3 in EN ISO 14065:2021.

Competence prerequisites

[additional] The documented competence criteria shall address, as applicable (in accordance with Commission Implementing Regulation (EU) 2025/2358, Articles 13(4)– (5) and 14):

a. knowledge of Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358;
b. knowledge of the applicable CRCF certification methodology;
c. knowledge of the ClimatePal EU scheme requirements;
d. validation and verification principles;
e. audit methods;
f. risk assessment, materiality and sampling;
g. GHG quantification;
h. baseline and additionality assessment;
i. long-term storage and reversal risk;
j. sustainability requirements;
k. sector-specific technical knowledge;
l. group auditing;
m. applicable legal requirements;
n. impartiality; and
o. reporting and certification decision requirements.

6.1.2.2 Personnel records

See 6.1.2.2 in EN ISO/IEC 17065:2012. For validation and verification personnel, see also 7.3 in EN ISO/IEC 17029:2019 and 7.3 in EN ISO 14065:2021.

Personnel competence records

[additional] The records shall include ClimatePal EU training and examination status, methodology-specific authorisations, witnessed performance where applicable, conflict-of-interest evaluations and the date of the most recent competence review (Commission Implementing Regulation (EU) 2025/2358, Article 14).

6.1.2.3 Minimum Competence of Auditors [additional]

Auditor competence criteria

Auditors assigned under the ClimatePal EU scheme shall in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 13(5):

a. be independent of the activity being audited;

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b. be free from conflicts of interest;

c. have at least two years' experience in life-cycle assessment or a demonstrated equivalent level of relevant capacity;

d. have specific experience in auditing GHG emission calculations in accordance with the applicable certification methodology;

e. have additional activity-specific experience, as applicable, in agriculture, agronomy, ecology, forestry, natural science, silviculture, engineering, building materials and embodied carbon, energy management or a related field;

f. possess technical knowledge of soil science where soil organic carbon is included in the audit scope; and

g. have experience in group auditing where assigned to a group audit.

Objective competence evidence

The certification body shall determine the objective evidence required to demonstrate compliance with each criterion. Self-declaration by the auditor shall not, by itself, constitute sufficient evidence of competence.

6.1.2.4 Technical Reviewers [additional]

Technical reviewers' prerequisites

Technical reviewers shall be competent in (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 10(2); 7.3 and 9.6 from EN ISO/IEC 17029:2019 and 7.3 and 9.6 from EN ISO 14065:2021):

a. the applicable activity category;

b. the applicable certification methodology;

c. validation or verification, as applicable;

d. audit risk, materiality and sampling;

e. quantification and monitoring methods;

f. classification and treatment of non-conformities; and

g. the requirements for audit reports and certificates of compliance.

6.1.2.5 Certification Decision-Makers [additional]

Certificate decision makers prerequisites

Certification decision-makers shall be competent to evaluate (in accordance with 7.3 and 9.7 from EN ISO/IEC 17029:2019 and 7.3 and 9.7 from EN ISO 14065:2021):

a. the completeness of the certification process;

b. the adequacy of the technical review;

c. the implications of non-conformities;

d. the applicable certification requirements;

e. the proposed certification scope; and

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f. the appropriate certification status.

6.1.2.6 ClimatePal EU Training [additional]

Training rules

Before performing an audit on behalf of the ClimatePal EU scheme, each auditor shall in accordance with the Commission Implementing Regulation (EU) 2025/2358, Article 14:

a. complete the applicable ClimatePal EU training;

b. pass the applicable examination for the technical area concerned;

c. be authorised by the certification body; and

d. have a current training status recorded by ClimatePal EU.

Training validity and refreshers

The certification body shall assign only auditors whose required training, examination and authorisation remain valid. Auditors shall complete ClimatePal EU refresher training at least once every 36 months and, before their next relevant audit, any additional training required following a material change to the regulatory framework, applicable certification methodology or ClimatePal EU scheme requirements. The minimum auditor competence requirements are specified in Clause 6.1.2.3.

6.1.3 Contract with Personnel

See 6.1.3 in EN ISO/IEC 17065:2012. For validation and verification personnel, see also 7.2 in EN ISO/IEC 17029:2019 and 7.2 in EN ISO 14065:2021.

Personnel contracts

[additional] The legally enforceable agreements shall require compliance with applicable ClimatePal EU requirements and notification of circumstances affecting ClimatePal EU training status, methodology authorisation or eligibility for assignment.

6.2 Resources for Evaluation

6.2.1 Internal Resources

See 6.2.1 in EN ISO/IEC 17065:2012 and note. For verification resources under the certification body's direct control, see also 7.1–7.4 in EN ISO/IEC 17029:2019 and 7.1–7.4 in EN ISO 14065:2021.

Internal resources for evaluation

[additional] The certification body shall control evaluation methods, sampling procedures, data-analysis and calculation tools, measurement equipment and metrological traceability, where applicable. Where testing or calibration is used, see 6 and 7 in ISO/IEC 17025:2017; where inspection is used, see 6 and 7 in ISO/IEC 17020:2026, subject to the applicable edition and transition arrangements.

Authority-specific requirements

The certification body shall comply with the applicable rules, decisions and sector-specific requirements of the relevant national accreditation body or, where the recognition route is used, the relevant national competent authority.

6.2.2 External resources

6.2.2.1 Competence of Outsourced Evaluation Resources

See 6.2.2.1 in EN ISO/IEC 17065:2012 and notes. For outsourced validation and verification resources, see also 7.4 in EN ISO/IEC 17029:2019, as applicable.

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[additional] External audit resources shall demonstrate the knowledge, experience, skills and capacity necessary to perform the assigned validation or verification activities effectively (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 13(2)).

External resources for evaluation

6.2.2.2 Use of Non-Independent Outsourced Bodies

See 6.2.2.2 in EN ISO/IEC 17065:2012.

6.2.2.3 Legally Binding Agreement with Outsourced Bodies

See 6.2.2.3 in ENISO/IEC 17065:2012.

6.2.2.4 Control of Outsourced Bodies

See 6.2.2.4 in EN ISO/IEC 17065:2012 and note.

6.2.2.5 Restrictions on Outsourcing [additional]

The certification body shall retain responsibility and authority for technical review and certification decisions. Those functions shall not be transferred to an uncontrolled external body (in accordance with 9.6–9.7 from ISO/IEC 17029:2019 and 9.6–9.7 EN ISO 14065:2021).

Outsourcing limitations

An individual technical reviewer or decision-maker may be employed by, contracted directly to, or employed by an entity under the organisational control of the certification body, if Clauses 7.5 and 7.6 of ISO/IEC 17065:2012 are fulfilled.

Permitted personnel arrangements

7. Process Requirements for Certification Bodies

7.1 General Process Requirements

See 7.1 in EN ISO/IEC 17065:2012.

[additional] Following Regulation (EU) 2024/3012, Articles 9–10 and Commission Implementing Regulation (EU) 2025/2358, Articles 10–15 the certification body shall be responsible for:

Certification process

a. carrying out certification audits, constituting validation of an activity;
b. carrying out re-certification audits and monitoring audits, constituting verification;
c. reviewing and validating the results of those audits;
d. taking certification decisions;
e. issuing, maintaining, updating, reducing, suspending, restoring and withdrawing certificates of compliance;
f. preparing the audit reports required under the Carbon Removals and Carbon Farming (CRCF) Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358;

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g. maintaining certification records and current certification status information; and

h. cooperating with ClimatePal EU, the national accreditation body, competent national authorities and the European Commission.

7.1.1 Operation of the Certification Scheme

See 7.1.1 in EN ISO/IEC 17065:2012 and notes.

Operational requirements

[additional] The certification body shall operate certification activities under the ClimatePal EU scheme in accordance with:

a. Regulation (EU) 2024/3012;

b. Commission Implementing Regulation (EU) 2025/2358;

c. the applicable certification methodology;

d. the ClimatePal EU 201 Certification Programme; and

e. the current controlled procedures and templates of ClimatePal EU.

Allocated certification functions

The certification body shall perform the selection, evaluation, review, certification decision, attestation and surveillance functions allocated to it in ClimatePal EU 201 Certification Programme as well as in this document.

Controlled scheme requirements

The certification body shall apply the certification requirements, evaluation methods, interpretations, templates and outputs approved by ClimatePal EU and shall not independently amend or supplement the certification criteria applicable to operators or activities.

Interpretation referral

Where an interpretation is required, the certification body shall refer the matter to ClimatePal EU in accordance with the scheme interpretation procedure.

7.1.2 Certification Requirements

See 7.1.2 in EN ISO/IEC 17065:2012 and note.

Certification requirements

[additional] The certification body shall not introduce or modify operator or activity certification criteria independently of ClimatePal EU. An exception applies only where a requirement is imposed by applicable law or by a binding requirement of the relevant national accreditation body or competent national authority. Any such requirement shall be documented and shall not be represented as a ClimatePal EU certification criterion.

7.1.3 Explanations and Interpretations

See 7.1.3 in EN ISO/IEC 17065:2012.

Approved interpretations only

[additional] Where clarification of a certification requirement is required, the certification body shall apply only an interpretation approved through the ClimatePal

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EU interpretation process or otherwise formally authorised under the ClimatePal EU 201 Certification Programme.

The certification body shall not use an individual interpretation to alter, reduce or expand the approved certification requirements.

No unilateral reinterpretation

7.1.4 Audit Types [additional]

Following Regulation (EU) 2024/3012, Article 9(2)– (3) and Commission Implementing Regulation (EU) 2025/2358, Articles 2(a), 10(1)– (2) and 13(1) the certification body shall distinguish the following audit types:

Audit-type distinction

The certification audit:

Certification audit

a. constitutes validation;
b. shall be completed before certification of the activity;
c. shall always include an on-site component;
d. shall provide at least reasonable assurance regarding the effectiveness of the operator's relevant internal processes; and
e. shall determine whether the activity complies with the applicable certification requirements.

The re-certification audit:

Re-certification audit

a. constitutes verification;
b. shall be conducted at least every five years or more frequently where required by the applicable certification methodology;
c. shall reconfirm conformity with Articles 4–7 of Regulation (EU) 2024/3012;
d. shall verify the net carbon removal benefit or net soil emission reduction benefit generated by the activity; and
e. shall be performed at a reasonable level of assurance.

The certification audit and first re-certification audit may be conducted concurrently at the request of the operator, provided that all requirements applicable to both audits are fulfilled.

Concurrent audits

The monitoring audit:

Monitoring audit

a. constitutes verification;
b. shall be conducted at the frequency specified in the applicable certification methodology;
c. shall verify monitoring of stored carbon;

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d. shall identify and evaluate any reversal; and

e. shall be conducted at the assurance level required by the applicable certification methodology.

Consistent audit terminology

The definitions and minimum conditions in this clause shall be used consistently in the ClimatePal EU 110 Glossary, audit templates and certification records.

7.1.5 Audit Standards [additional]

See 9.4–9.5 in EN ISO/IEC 17029:2019 and 9.4–9.5 in EN ISO 14065:2021.

Applicable audit standards

Audits shall be planned and conducted in accordance with 9.2 and 9.4 from ISO/IEC 17021-1:2015, together with 4 and 6 from ISO 19011:2026, as applicable (in accordance with Commission Implementing Regulation (EU) 2025/2358, Articles 10(3) and 13(4)).

Core audit principles

The certification body shall apply:

a. professional scepticism;

b. risk-based audit planning;

c. materiality considerations;

d. appropriate sampling;

e. sufficient and appropriate objective evidence; and

f. documented audit conclusions.

7.2 Application

See 7.2 in EN ISO/IEC 17065:2012 and notes.

Application rules

[additional] The application here refers to the engagement of the CB following ClimatePal EU's acceptance according to ClimatePal EU 201 Certification Programme 5.1, 6.2-6.3. The application from the operator to ClimatePal EU shall contain the information needed to define the certification scope, select the applicable methodology, review competence and impartiality, and plan the audit, including (in accordance with Regulation (EU) 2024/3012, Article 9(1) and Commission Implementing Regulation (EU) 2025/2358, Articles 3 and 8 and Annexes I–II):

a. the operator's or group of operator's legal name, legal status and contact details;

b. the identity and authority of the group manager;

c. the requested certification scope;

d. the activity type and applicable certification methodology;

e. the activity plan;

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f. the monitoring plan;

g. the geographical locations and georeferenced boundaries of the activity;

h. the operator's or group of operators organisational and technical resources;

i. outsourced activities and relevant contractors;

j. the expected net carbon removal benefit or net soil emission reduction benefit;

k. the applicable liability arrangements;

l. other certifications or registrations;

m. current or previous participation in other certification schemes;

n. previous audit reports and certificate-status decisions where required;

o. information on previous non-conformities;

p. group structure and internal control system, where applicable; and

q. any other information required to determine competence, audit duration, sampling, locations and evaluation methods.

No certification decision

Receipt of an application or acceptance of the operator by ClimatePal EU shall not constitute a certification decision by the certification body.

7.3 Application Review

7.3.1 Review of Application Information

See 7.3.1 in EN ISO/IEC 17065:2012. For validation and verification engagements, see also 9.2 in EN ISO/IEC 17029:2019 and 9.2 in EN ISO 14065:2021.

Application review process

[additional] In accordance with Commission Implementing Regulation (EU) 2025/2358, Articles 8, 10, 12 and 13 the application review shall confirm that:

a. the applicable certification methodology has been identified;

b. the activity falls within the certification body´s valid accreditation and ClimatePal EU appointment;

c. the applicable assurance level can be achieved;

d. the proposed duration, location, sampling and evaluation, methods are appropriate;

e. impartiality and conflict-of-interest checks have been completed;

f. group-audit eligibility has been established, where applicable; and

g. the information required in relation to participation in other certification schemes has been obtained.

ClimatePal application acceptance

The review of the application by the certification body does not constitute approval of the application. The application shall only be accepted by ClimatePal EU, as specified

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in Clause 5.1 in ClimatePal EU 201 Certification Programme. Nevertheless, the certification body shall receive the application form, review the information relevant to the certification audit, and take that information into account when planning and conducting the audit, together with the activity plan and monitoring plan.

7.3.2 Identification of New or Unfamiliar Certification Request

See 7.3.2 in EN ISO/IEC 17065:2012 and note.

7.3.3 Demonstration of Competence and Capability

See 7.3.3 in EN ISO/IEC 17065:2012.

7.3.4 Declining a Certification Request

See 7.3.4 in EN ISO/IEC 17065:2012.

7.3.5 Reliance on Certification Previously Granted to the Operator

See 7.3.5 in EN ISO/IEC 17065:2012.

7.3.6 Participation in Other Certification Schemes [additional]

History with other schemes

The certification body shall obtain and review the information required under Article 8 of Commission Implementing Regulation (EU) 2025/2358, including:

a. participation by the operator or its legal predecessor in another certification scheme during the preceding five years;

b. the two most recent re-certification audit reports under another scheme;

c. relevant findings and certificate suspensions or withdrawals during the preceding five years; and

d. any withdrawal from another scheme before the first re-certification audit.

Eligibility confirmation

The certification body shall provide the information to ClimatePal EU and shall not proceed until ClimatePal EU has confirmed the operator's or group of operator's eligibility.

Prior-audit follow-up

Where ClimatePal EU permits an application following a failed certification audit conducted more than three years previously, or where the previous scheme ceased certification activities, the certification body shall adjust the audit scope to address the shortcomings identified during the previous audit.

7.3.7 Pre-Engagement Review for Validation and Verification [additional]

See 9.2 in EN ISO/IEC 17029:2019 and 9.2 in EN ISO 14065:2021.

Pre-engagement checks

Before accepting a validation or verification assignment, the certification body shall confirm that:

a. the claim to be validated or verified, including its boundaries and applicable reporting period, is clearly understood;

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b. the applicable certification methodology and specified requirements have been identified;

c. the objectives and scope of the validation or verification have been established;

d. the applicable level of assurance and materiality requirements have been identified;

e. the necessary evidence-gathering activities can be performed;

f. the required audit duration and timeframe can be determined;

g. the required access arrangements can be established; and

h. the certification body has access to the required competence and resources.

Assignment decision basis

On completion of the pre-engagement review, the certification body shall accept or decline the assignment and shall retain the basis for that decision.

7.4 Evaluation

7.4.1 Evaluation Plan

See 7.4.1 in EN ISO/IEC 17065:2012 and note. For validation and verification planning, see also 9.4–9.5 in EN ISO/IEC 17029:2019 and 9.4–9.5 in EN ISO 14065:2021.

Evaluation rules

[additional] For each audit, the evaluation plan shall define, as applicable:

a. audit objectives;

b. audit scope;

c. audit criteria and controlled document versions;

d. audit type and assurance level;

e. audit team and technical experts;

f. sites, installations, land parcels and group members to be evaluated;

g. on-site and desk-based activities;

h. audit dates and duration;

i. risk assessment;

j. materiality considerations;

k. sampling methods;

l. data-testing methods;

m. stakeholder consultation, where applicable;

n. methods for checking calculations, estimates and uncertainty;

o. follow-up of previous findings;

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p. reporting arrangements; and

q. requirements for technical review.

Evidence-plan basis

The evaluation plan shall include, or be supported by, an evidence-gathering plan based on:

a. the certification body's understanding of the activity and claim;

b. the assessed risk of material misstatement;

c. the operator's controls over data and information;

d. the applicable level of assurance; and

e. the applicable materiality requirements.

Evidence-gathering activities

The evidence-gathering plan shall define the nature and extent of evidence-gathering activities, including data testing, sampling, recalculation, site visits, interviews and review of source records, as applicable.

Plan revisions

The evaluation plan and evidence-gathering plan shall be revised where necessary during the audit. Revisions and the reasons for them shall be documented and communicated to the operator.

7.4.2 Assignment of Evaluation Personnel

See 7.4.2 in EN ISO/IEC 17065:2012 and note. For validation and verification personnel assignment, see also 7.2–7.3 and 9.4 in EN ISO/IEC 17029:2019 and 7.2–7.3 and 9.4 in EN ISO 14065:2021.

Evaluation personnel

[additional] The assignment decision shall be documented and shall demonstrate that the audit team collectively fulfils the applicable competence requirements. The operator shall be informed of the audit-team composition sufficiently in advance to permit a substantiated objection (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 13(4)– (6)).

7.4.3 Information for Evaluation Personnel

See 7.4.3 in EN ISO/IEC 17065:2012 and note. For validation and verification personnel assignment, see also 9.4 in EN ISO/IEC 17029:2019 and 9.4 in EN ISO 14065:2021.

Audit team information

[additional] The certification body shall ensure that the audit team has access to:

a. the application information;

b. the activity plan;

c. the monitoring plan;

d. the applicable monitoring report;

e. previous audit reports;

f. previous non-conformities and corrective actions;

g. complaints relevant to the audit;

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h. applicable legal, methodological and ClimatePal EU requirements;

i. relevant scheme interpretations; and

j. other information necessary to conduct the audit.

7.4.4 Conduct of Evaluation

See 7.4.4 in EN ISO/IEC 17065:2012. For validation and verification execution see also 9.5 in EN ISO/IEC 17029:2019 and 9.5 in EN ISO 14065:2021.

Evaluation process

[additional] The certification body shall obtain sufficient and appropriate objective evidence that is traceable through the operator's data-management, analysis and calculation processes. It shall identify errors, omissions and misstatements and assess their individual and aggregate materiality (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 10(4)).

Information-system evaluation

The audit team shall evaluate whether the operator's or group of operator's information system effectively:

a. identifies relevant data and information;

b. collects and records the data required by the applicable certification methodology;

c. applies appropriate data-quality controls;

d. maintains traceability through calculations and reporting; and

e. identifies and corrects data-related non-conformities.

Evidence-based conformity

The audit team shall evaluate conformity with the applicable certification requirements based on the evidence obtained.

7.4.4.1 Minimum Audit Activities [additional]

Additional audit prerequisites

Certification and re-certification audits shall cover at least the following activities (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 10(4)):

a. identification of the activity relevant to the certification scope;

b. identification of the operator's or group of operators relevant control systems and overall organisation;

c. evaluation of the effective implementation of those control systems;

d. analysis of risks that could lead to a material error, omission or misstatement;

e. preparation of a validation or verification plan corresponding to the identified risks and the scope and complexity of the activity;

f. definition and application of sampling methods;

g. collection of sufficient and appropriate evidence;

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h. verification of the accuracy, completeness, consistency and traceability of data;

i. evaluation of quantification calculations and material assumptions;

j. evaluation of the activity against the applicable CRCF quality criteria and certification methodology;

k. requests for missing audit trails or explanations of variations;

l. requests for revision of claims or calculations where necessary; and

m. documentation of the audit conclusion.

Independent audit evidence

Self-declarations shall not, by themselves, constitute sufficient audit evidence.

7.4.4.2 Information Submitted Before the Audit [additional]

Pre-audit information

The certification body shall require the operator or group manager to submit the following information in advance of the relevant audit, in accordance with ClimatePal EU 201 Certification Programme (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 11):

a. the activity plan and monitoring plan before the certification audit;

b. the monitoring report before a re-certification audit or monitoring audit;

c. supporting calculations, datasets and evidence necessary for audit planning; and

d. information on changes, complaints, reversals and previous findings.

Re-certification report

For a re-certification audit, the monitoring report shall include the calculation of the net carbon removal benefit or net soil emission reduction benefit and information relating to liability and sustainability.

Monitoring report

For a monitoring audit, the monitoring report shall include information on stored carbon and any reversal.

7.4.4.3 Conditions to be Verified Before Certification [additional]

Pre-certification controls

The certification body shall verify in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 10(5) that the operator or group of operators:

a. maintains a documentation management system;

b. maintains an auditable system for safeguarding and reviewing evidence;

c. retains the required evidence for at least five years after the end of the monitoring period, or longer where required by national law; and

d. accepts responsibility for preparing the information submitted for audit.

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7.4.4.4 Group Auditing [additional]

Group audit rules

Group auditing shall be used only for carbon farming activities. Before applying group auditing, the certification body shall verify that (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 12):

a. the activity areas are geographically proximate;

b. the activity areas 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;

e. the group has a documented, risk-based internal control system; and

f. an identified group manager legally represents the group and is responsible for ensuring conformity of the group members.

Minimum group sample

The number of group members in the minimum audit sample shall be equivalent to the square root of the total number of group members. Where the result is not a whole number, it shall be rounded upwards to the next whole number. The sampled members shall be audited individually at the frequency specified in the applicable certification methodology. The sample shall be increased where the group presents a higher risk.

Sample composition

The sample shall:

a. be representative of the group;

b. combine risk-based and random selection;

c. include random selection of at least 25% of the members in the sample;

d. ensure that the randomly selected members represent at least 25% of the total area covered by the activities in the sample; and

e. vary at each verification.

Repeated selection

Previously audited members may be selected again where justified by risk.

Group risk

The certification body shall determine the general level of risk of the areas covered by the activities of the group and shall take that level of risk into account when determining the audit approach.

Risk assessment

The risk assessment shall consider, as applicable, at least:

a. the size of the group and geographical distribution of its members;

b. variability in pedoclimatic conditions within the group;

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c. variability in activities, practices or calculation procedures;

d. changes in group membership or certified activity area;

e. previous non-conformities and corrective actions;

f. weaknesses identified in the internal control system or internal inspections;

g. the reliability, completeness and traceability of monitoring data;

h. material changes affecting the activities; and

i. risks identified in the applicable certification methodology.

Risk-based sample increase

Where the overall level of risk is higher, the external audit sample shall be increased. The proportion of sampled group members audited on-site shall also be increased where necessary to address the identified risks.

Audit approach

The certification body shall assess the group manager and the group-level internal control system against the applicable requirements of ClimatePal EU 201 Certification Programme and the applicable certification methodology. The group manager shall always be audited on-site. A group member may be audited on a desk-based basis only where the certification body demonstrates that the desk-based audit provides a level of assurance comparable to an on-site audit and sufficient evidence is available to support the audit conclusion.

Desk-audit criteria

The certification body shall take into account at least the following when determining whether a desk-based audit is appropriate:

a. the availability and traceability of the monitoring and activity records required by the applicable certification methodology;

b. the availability of evidence enabling the location, activity area and relevant activity data to be verified remotely;

c. the results of the group's internal inspections;

d. previous audit findings and corrective actions;

e. material changes affecting the group member or activity; and

f. whether relevant site-specific conditions can be adequately assessed without an on-site visit.

Desk-audit evidence

Self-declarations by the group member shall not, on their own, constitute sufficient evidence for a desk-based audit.

On-site fallback

Where the available evidence does not provide a level of assurance comparable to an on-site audit, the group member shall be audited on-site.

Additional sampling

Where a critical or major non-conformity is identified for one operator in the initial sample, the certification body shall audit an additional sample of the same size.

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Systemic group findings

Findings affecting the effective operation of the internal control system or indicating that a non-conformity may extend beyond an individual group member shall be treated as potentially systemic. The certification body shall extend the audit scope as necessary to determine their extent.

Group-wide consequences

Systemic non-conformity across the sample shall result in suspension or withdrawal of certification of the whole group, as applicable.

Group audit reporting

The certification and re-certification audit report for a group shall, in addition to the general audit-report requirements of this document, identify at least:

a. the group and group manager;
b. the total number of group members within the certification scope;
c. the total activity area covered by the group;
d. the number and identity of group members included in the audit sample;
e. the basis for risk-based and random sample selection;
f. any increase of the minimum sample resulting from the risk assessment;
g. which sampled members were audited on-site or desk-based; and
h. any additional sampling undertaken as a result of identified non-conformities.

7.4.5 Use of Prior Evaluation Results

See 7.4.5 in EN ISO/IEC 17065:2012 and note.

Prior-result acceptance

[additional] Prior evaluation results may be accepted only where:

a. their use is permitted by the ClimatePal EU scheme;
b. the applicable conformity-assessment requirements were fulfilled;
c. the original selection activities are compatible with the current certification requirements;
d. the competence of the original evaluation provider has been demonstrated;
e. technical equivalence has been established; and
f. the certification body accepts responsibility for the use of those results.

Acceptance rationale

The basis for accepting prior evaluation results shall be documented.

7.4.6 Non-Conformities

See 7.4.6 in EN ISO/IEC 17065:2012.

Non-conformities

[additional] Non-conformities shall be classified as critical, major or minor in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 6:

Finding documentation

Each non-conformity shall identify:

a. the requirement not fulfilled;

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b. the objective evidence;

c. the classification;

d. the required correction or corrective action;

e. the applicable timeframe; and

f. the consequence for certification.

Non-conformities classifications

The classifications and mandatory consequences are established in Articles 6 and 7 of Commission Implementing Regulation (EU) 2025/2358. The applicable definitions and minimum examples for each classification are presented in Table 1.

Table 1: Classification, definitions and minimum examples of non-conformities

Classification	Definition	Minimum examples
Critical	Fraud, irreversible non-conformity or another violation that jeopardises scheme integrity.	Non-compliance with Articles 4–7 of Regulation (EU) 2024/3012 or the applicable certification methodology; deliberate misstatement of the activity description; and falsification of GHG data.
Major	A potentially reversible and repeated violation revealing systematic problems or a possible fundamental systemic failure.	Systematic problems with reported GHG data, including incorrect documentation identified in more than 10% of the claims in the representative sample; failure to disclose participation in another carbon removal certification scheme; and failure to provide information required by the certification body for the audit.
Minor	A limited, isolated or temporary lapse that would not cause a fundamental systemic failure if left uncorrected.	Has limited impact; constitutes an isolated or temporary lapse; and would not result in a fundamental systemic failure if not corrected.

Mandatory consequences

Mandatory certification consequences and remediation periods are specified in Clause 7.11.7 (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 7).

7.4.7 Additional Evaluation Activities

See 7.4.7 in EN ISO/IEC 17065:2012.

7.4.8 Continuation of the Evaluation Process

See 7.4.8 in EN ISO/IEC 17065:2012.

7.4.9 Documentation of Evaluation Results and Audit Reports

See 7.4.9 in EN ISO/IEC 17065:2012 and notes. For fair presentation and validation or verification reporting, see also 4.2.3 and 9.5.5 in EN ISO/IEC 17029:2019.

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Mandatory report template

[additional] For each audit, the certification body shall issue an audit report using the applicable ClimatePal EU 333 Audit Report Template.

Required audit report content

The certification audit report and re-certification audit report shall contain at least (in accordance with Regulation (EU) 2024/3012, Article 9(2)– (3); Commission Implementing Regulation (EU) 2025/2358, Article 3(3) and Annex III):

a. an audit-report summary;
b. the operator's name and address;
c. for group certification, the group manager and the activities and operators or group of operators within scope;
d. the geographical locations, including longitude and latitude;
e. the certification scope and applicable certification methodology;
f. references to the activity plan and monitoring plan;
g. the expected benefit for a certification audit or verified benefit for a re-certification audit;
h. the sustainability co-benefits;
i. the certification body's name, address and logo;
j. the audit-team composition;
k. the national accreditation body, accreditation scope and accreditation date or, where the recognition route applies, the recognising national competent authority, recognition scope and recognition date;
l. the audit date;
m. the audit itinerary and duration, distinguishing on-site and desk-based activities;
n. the ClimatePal EU documents and versions evaluated;
o. the sites evaluated;
p. the audit method, including risk assessment, sampling and stakeholder consultation;
q. other certification schemes or standards applicable to the activity;
r. the GHG-data type;
s. the unique certificate number or code;
t. the unique audit-report number or code
u. the place and date of issue of the audit report;
v. the certification outcome, including either certificate-validity dates or the non-conformities and applicable remediation timeframes; and

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w. the signature, stamp or other defined authorisation of the issuing party.

Accurate audit reporting

The audit report shall present the audit activities, evidence, findings and conclusions accurately and impartially.

Audit limitations and changes

The report shall identify:

a. significant limitations or obstacles encountered during the audit;

b. material changes made to the audit or evidence-gathering plan; and

c. unresolved diverging views between the audit team and the operator, where relevant to the audit conclusion.

Monitoring-audit content

A monitoring-audit report shall contain the applicable elements above and the monitoring, stored-carbon, reversal and liability information required by the applicable certification methodology (in accordance with Regulation (EU) 2024/3012, Article 9(2)– (3); Commission Implementing Regulation (EU) 2025/2358, Article 3(3) and Annex III).

7.5 Review

7.5.1 Independent Technical Review

See 7.5.1 in EN ISO/IEC 17065:2012. For validation and verification review, see also 9.6. in EN ISO/IEC 17029:2019 and 9.6 in EN ISO 14065:2021.

Technical review rules

[additional] The technical reviewer shall according to Commission Implementing Regulation (EU) 2025/2358, Article 10(2):

a. not have participated in the evaluation activities under review;

b. be independent of the operator and free from conflicts of interest;

c. be authorised for the applicable activity and certification methodology; and

d. review the audit results and confirm, before the certification decision is taken, that the audit conclusion is supported by sufficient and appropriate evidence.

Technical-review checks

The technical review shall determine whether:

a. the application review is complete and its required conclusions are documented;

b. the audit scope and audit plan cover the applicable requirements and identified risks;

c. the audit team was competent and impartial;

d. the assurance level was achieved;

e. risk, materiality and sampling were appropriately addressed;

f. sufficient and appropriate evidence was obtained;

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g. calculations and data evaluations were checked using the methods required by the evaluation plan;

h. findings were supported by evidence;

i. non-conformities were correctly classified;

j. corrections and corrective actions were verified against the defined closure criteria;

k. the audit report is complete and accurate; and

l. the audit conclusion is supported by the available evidence.

Decision-readiness review

The technical review shall confirm that:

a. all activities required by the certification agreement, the applicable certification methodology and the ClimatePal EU scheme have been completed;

b. the evidence is sufficient and appropriate to support the proposed certification decision;

c. material errors, omissions and misstatements have been properly evaluated;

d. significant findings have been identified, resolved and documented; and

e. the audit conclusion is consistent with the evidence obtained.

Reviewer clarification

Where clarification is required, the technical reviewer shall communicate the matter to the audit team. The audit team shall address the reviewer's concerns before the certification decision is taken.

7.5.2 Recommendations Arising from Review

See 7.5.2 in EN ISO/IEC 17065:2012.

Independent CB review retained

[additional] ClimatePal EU internal monitoring or report review shall not replace the certification body's technical review (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 5(1)).

7.6 Certification Decision

7.6.1 Responsibility and Authority

See 7.6.1 in EN ISO/IEC 17065:2012. For validation and verification decisions and statements, see also 9.7 in EN ISO/IEC 17029:2019 and 9.7 in EN ISO 14065:2021.

Certification decision rules

[additional] ClimatePal EU shall not direct, determine or alter an individual certification decision (In accordance with ClimatePal EU 101 Governance Clause 4.2).

7.6.2 Assignment of Decision-Making Personnel

See 7.6.2 in EN ISO/IEC 17065:2012 and note.

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7.6.3 Employment or Contractual Status of Decision-Making Personnel

See 7.6.3 in EN ISO/IEC 17065:2012.

7.6.4 Organisational Control

See 7.6.4 in EN ISO/IEC 17065:2012 and note.

7.6.5 Requirements for Personnel Under Organisational Control

See 7.6.5 in EN ISO/IEC 17065:2012.

7.6.6 Notification of Refusal to Grant Certification

See 7.6.6 in EN ISO/IEC 17065:2012 and note.

7.6.7 Basis and Types of Certification Decision [additional]

Decision evidence basis

The certification decision shall be based on (in accordance with 9.7 from ISO/IEC 17029:2019 and 9.7 from EN ISO 14065:2021):

a. the application and application review;

b. the complete evaluation results;

c. the audit report;

d. the technical review;

e. the status of non-conformities;

f. the proposed certification scope; and

g. any other relevant certification information.

Certification status decisions

The certification body shall take and document decisions concerning:

a. granting certification;

b. refusing certification;

c. maintaining certification;

d. issuing an updated certificate;

e. extending or reducing the certification scope;

f. suspending certification;

g. restoring certification; and

h. withdrawing certification.

7.7 Certification Documentation

7.7.1 Certificate of Compliance

See 7.7.1 in EN ISO/IEC 17065:2012 and note. For validation and verification statements, see also 9.7 in EN ISO/IEC 17029:2019 and 9.7 in EN ISO 14065:2021.

Certificate of compliance

[additional] The certificate of compliance or updated certificate of compliance shall use the approved ClimatePal EU template and shall additionally contain, as

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applicable, the information required by Article 9 and Annex II to Regulation (EU) 2024/3012, including:

a. the activity name and type, including the technologies, practices and processes applied;
b. the operator's or group's contact details;
c. the activity location and geographically explicit boundaries;
d. the activity-period start and end dates;
e. the name of the ClimatePal EU scheme;
f. the certification body's name, address and logo;
g. the place and date of issue and validity period;
h. the applicable certification methodology;
i. the permanent net carbon removal benefit, temporary net carbon removal benefit or net soil emission reduction benefit;
j. carbon removals under the baseline or soil emissions under the baseline;
k. total carbon removals or total soil emissions;
l. associated direct and indirect GHG emissions;
m. the required breakdown by gases, sources, carbon sinks and carbon stocks;
n. the duration of the monitoring period;
o. biomass-use and sustainability information, where applicable;
p. sustainability co-benefits;
q. carbon-farming co-benefits, where applicable;
r. other relevant certification and its unique certificate number or code;
s. the applicable liability mechanism, contribution and liable person;
t. the quantity and validity of certified units, where applicable; and
u. uncertainties in the quantification of carbon removals or soil emission reductions.

7.7.2 Authorisation of Certification Documentation

See 7.7.2 in EN ISO/IEC 17065:2012 and note.

7.7.3 Conditions of Issue

See 7.7.3 in EN ISO/IEC 17065:2012.

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7.8 Directory of Certified Activities

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

Directory information

[additional] For the ClimatePal EU scheme, the directory information shall identify (in accordance with Regulation (EU) 2024/3012, Articles 11(4) and 12 and Commission Implementing Regulation (EU) 2025/2358, Articles 9, 15 and 16.):

a. the operator or group of operators;
b. the certified activity;
c. the applicable certification methodology;
d. the certification scope;
e. the certificate number;
f. the certificate-validity period; and
g. the current certification status.

Directory maintenance

The certification body shall:

a. provide current certification information to ClimatePal EU in the specified format;
b. inform ClimatePal EU without undue delay of any status change;
c. provide confirmation of certificate validity and scope upon request, subject to confidentiality requirements; and
d. verify the accuracy of information entered into the ClimatePal Registry and the Union Registry.

Interaction with ClimatePal Registry

Any discrepancy in ClimatePal Registry information shall be reported to ClimatePal without undue delay. The certification body shall collect, verify and submit the certification-related information assigned to it in the controlled ClimatePal Registry Data Specification. The information shall be complete, accurate and linked to the relevant operator, activity and certification document through the required unique identifiers. The registry data specifications are displayed in ClimatePal EU 201 Certification Programme Clause 12 and Annex A.

7.9 Surveillance

7.9.1 Surveillance Programme

See 7.9.1 in EN ISO/IEC 17065:2012 and notes.

Surveillance rules

[additional] The certification body shall implement re-certification and monitoring activities at the frequencies specified by Regulation (EU) 2024/3012 and the applicable certification methodology (in accordance with Regulation (EU) 2024/3012, Article 9(3); Commission Implementing Regulation (EU) 2025/2358, Articles 10(2) and 11).

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a. The certification body shall maintain a documented surveillance programme identifying:

b. the required audit type;

c. the audit due date;

d. the relevant activity and monitoring periods;

e. certificate-validity dates;

f. previous findings and corrective actions;

g. reported changes;

h. complaints;

i. reversals or potential reversals;

j. registry discrepancies; and

k. risk-based changes to audit scope, duration or intensity.

7.9.2 Application of Evaluation, Review and Decision Requirements

See 7.9.2 in EN ISO/IEC 17065:2012.

7.9.3 Continuing Use of Marks on Products

See 7.9.3 in EN ISO/IEC 17065:2012.

7.9.4 Continuing Conformity of Certified Processes and Services

See 7.9.4 in EN ISO/IEC 17065:2012.

7.10 Changes Affecting Certification

7.10.1 New or Revised Certification Requirements

See 7.10.1 in EN ISO/IEC 17065:2012 and note.

Changes affecting certification

This shall include changes to Union or national law, the applicable certification methodology, ClimatePal EU normative documents and the requirements of the relevant national accreditation body or recognising national competent authority. The certification body shall apply the formally established transition arrangements.

7.10.2 Other Changes Affecting Certification

See 7.10.2 in EN ISO/IEC 17065:2012 and note.

7.10.3 Actions Following Changes

See 7.10.3 in EN ISO/IEC 17065:2012 and note.

7.11 Termination, Reduction, Suspension or Withdrawal of Certification

7.11.1 Actions Following Substantiated Non-Conformity

See 7.11.1 in EN ISO/IEC 17065:2012 and note.

7.11.2 Application of Evaluation, Review, and Decision Requirements

See 7.11.2 in EN ISO/IEC 17065:2012.

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7.11.3 Status Information and Certification Documentation

See 7.11.3 in EN ISO/IEC 17065:2012.

7.11.4 Actions to Resolve Suspension

See 7.11.4 in EN ISO/IEC 17065:2012.

7.11.5 Evaluation, Review and Decisions Required to Resolve Suspension

See 7.11.5 in EN ISO/IEC 17065:2012.

7.11.6 Reinstatement Following Suspension

See 7.11.6 in EN ISO/IEC 17065:2012.

7.11.7 Mandatory Consequences of Operator Non-Conformities [additional]

Consequences of non-conformities

Based on the Commission Implementing Regulation (EU) 2025/2358, Article 7 the certification body shall apply the following mandatory consequences:

a. Critical non-conformity

Critical NC consequences

Where a critical non-conformity is identified during an initial certification audit:

1. no certificate shall be issued; and
2. a new application shall not be accepted until the waiting period established by ClimatePal EU has elapsed.

Critical NC after certification

Where a critical non-conformity is identified after certification:

1. the certificate shall be withdrawn immediately; and
2. no further certified units shall be issued in relation to the affected certification.

b. Major non-conformity

Major NC consequences

Where a major non-conformity is identified during an initial certification audit, no certificate shall be issued. Where a major non-conformity is identified after certification:

1. the certificate shall be suspended immediately; and
2. the certificate shall be withdrawn if the operator does not complete the required remediation within 90 days of notification of the suspension.

c. Minor non-conformity

Minor NC consequences

The operator shall complete remediation within the period specified by ClimatePal EU. The period shall not exceed 12 months from notification.

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Information update requirements

The certification body shall notify ClimatePal without undue delay of any suspension, withdrawal, restoration, reduction, termination or expiry and shall support the corresponding update of ClimatePal Registry information.

7.11.8 Loss or Restriction of Accreditation or Appointment [additional]

Status-loss actions

Where the certification body's accreditation or ClimatePal EU appointment is suspended, reduced, withdrawn, terminated or expires, the certification body shall:

a. cease the affected certification activities;

b. cease representing itself as authorised for those activities;

c. notify ClimatePal EU and affected operators;

d. prevent continued unauthorised use of affected certificates and claims;

e. cooperate in the transfer or orderly termination of certification files;

f. retain required records; and

g. continue to cooperate with complaints, appeals and investigations concerning activities performed whilst appointed.

7.11.9 Facts Discovered After Issue of Certification Documentation [additional]

See 9.8 in EN ISO/IEC 17029:2019 and 9.8 in EN ISO 14065:2021.

Issues of certification documentation

Where facts or information discovered after the issue of an audit report, certificate of compliance or updated certificate of compliance could materially affect the audit conclusion or certification decision, the certification body shall:

a. notify the operator and ClimatePal EU without undue delay;

b. investigate the matter;

c. determine whether the audit report, certificate of compliance or certification status requires revision, suspension or withdrawal;

d. repeat the relevant evaluation, review or decision activities where necessary;

e. issue revised documentation stating the reason for revision, where applicable; and

f. notify competent authorities or other affected users where reliance on the original documentation may be compromised.

Post-issue records

The certification body shall retain records of the matter, the evaluation performed, the decision taken and all resulting communications.

7.12 Records

7.12.1 Certification Records

See 7.12.1 in EN ISO/IEC 17065:2012. For validation and verification records, see also 9.11 in EN ISO/IEC 17029:2019.

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[additional] Records shall include, as applicable:

Record procedures

a. applications and application reviews;

b. Certification Agreements and Cooperation Agreements;

c. accreditation or recognition and scope information;

d. impartiality and conflict-of-interest assessments;

e. competence evaluations and personnel authorisations;

f. audit-team assignments;

g. audit and sampling plans;

h. audit evidence and working papers;

i. calculations and data tests;

j. audit reports;

k. non-conformities, corrections and corrective actions;

l. technical reviews;

m. certification decisions;

n. certificates and updated certificates;

o. certification status changes;

p. registry-information verification;

q. complaints and appeals; and

r. relevant communications with operators, ClimatePal EU, accreditation bodies and competent authorities.

7.12.2 Confidential Handling and Transfer of Records

See 7.12.2 in EN ISO/IEC 17065:2012.

7.12.3 Retention Period

See 7.12.3 in EN ISO/IEC 17065:2012 and note.

[additional] Certification records shall be retained for the period required by applicable law, the applicable certification methodology, ClimatePal EU and the relevant national accreditation body or recognition authority. Where those requirements differ, the longest applicable retention period shall prevail.

Longest retention period

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7.12.4 Cooperation and Access [additional]

Supervisory cooperation

The certification body shall cooperate with ClimatePal EU, the national accreditation body, competent national authorities, the European Commission and any lawfully appointed supervisory body (in accordance with Regulation (EU) 2024/3012, Article 10(4); Commission Implementing Regulation (EU) 2025/2358, Article 15)

Supervisory access

Upon request, the certification body shall:

a. provide information required for supervision;

b. provide audit dates, times and locations;

c. provide access to audit reports, certificates and relevant certification records;

d. participate in witness assessments and file reviews;

e. facilitate access to operator premises where provided for in the certification agreement; and

f. verify or correct registry information.

Non-cooperation consequences

If the certification body fails or is unwilling to cooperate the consequences from ClimatePal EU 101 Governance 6.3-6.5 shall apply.

7.12.5 ClimatePal EU Monitoring and Oversight [additional]

ClimatePal EU oversight

The certification body shall provide ClimatePal EU with (in accordance with Commission Implementing Regulation (EU) 2025/2358, Article 5(1), and Articles 15–16):

a. all certification, re-certification and monitoring audit reports;

b. audit-report summaries;

c. certificates and updated certificates;

d. certification decisions;

e. records of non-conformities and remediation;

f. certification status changes; and

g. other information required for scheme monitoring or the ClimatePal Registry.

Oversight cooperation

The certification body shall cooperate with risk-based or random file reviews, witness assessments, competence reviews, complaint investigations and corrective-action follow-up conducted by ClimatePal EU.

Management meetings

The certification body shall designate an appropriate representative and participate in the meetings convened by Operational Management pursuant to Clause 6.2 of

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ClimatePal EU 101 Governance. Such meetings shall take place at least twice in each calendar year.

ClimatePal EU monitoring shall not transfer or reduce the certification body's responsibility for evaluation, technical review or certification decisions.

CB responsibility retained

Detailed requirements for the ClimatePal Registry are established in Clause 12 and Annex A of ClimatePal EU 201 Certification Programme. Submission of those records does not transfer responsibility for operating or overseeing the registry to the certification body.

Registry responsibility boundary

7.13 Complaints and Appeals

7.13.1 Documented Process and Records

See 7.13.1 in EN ISO/IEC 17065:2012. For validation and verification complaints, see also 9.10 in EN ISO/IEC 17029:2019.

7.13.2 Confirmation of Responsibility

See 7.13.2 in EN ISO/IEC 17065:2012. For validation and verification complaints, see also 9.10 in EN ISO/IEC 17029:2019.

[additional] Where a matter relates primarily to the ClimatePal EU scheme rather than to certification activities for which the certification body is responsible, the certification body shall refer the matter to ClimatePal EU and cooperate with the scheme-level investigation.

Scheme-level referral

7.13.3 Acknowledgement of Receipt

See 7.13.3 in EN ISO/IEC 17065:2012.

7.13.4 Collection and Verification of Information

See 7.13.4 in EN ISO/IEC 17065:2012.

7.13.5 Independent Decision

See 7.13.5 in EN ISO/IEC 17065:2012.

7.13.6 Conflict-of-Interest

See 7.13.6 in EN ISO/IEC 17065:2012.

7.13.7 Notification of Complaint Outcome

See 7.13.7 in EN ISO/IEC 17065:2012. For validation and verification complaints, see also 9.10 in EN ISO/IEC 17029:2019.

7.13.8 Notification of Appeal Outcome

See 7.13.8 in EN ISO/IEC 17065:2012. For validation and verification complaints, see also 9.9 in EN ISO/IEC 17029:2019.

7.13.9 Follow-up Action

See 7.13.9 in EN ISO/IEC 17065:2012.

[additional] Where relevant, follow-up action shall include notification to ClimatePal, correction of ClimatePal Registry information, additional evaluation or reconsideration of certification status.

Complaint follow-up

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8. Management System Requirements for Certification Bodies

8.1 Options

8.1.1 General Management System Requirements

See 8.1.1 in EN ISO/IEC 17065:2012. For validation and verification management systems, see also 11.1–11.6 in EN ISO/IEC 17029:2019 and 11.1–11.6 in EN ISO 14065:2021.

System assurance

[additional] The management system shall be capable of consistently fulfilling Regulation (EU) 2024/3012, Commission Implementing Regulation (EU) 2025/2358, the applicable certification methodology, the ClimatePal EU scheme requirements and the requirements applicable to the certification body's accreditation or recognition route.

8.1.2 Option A

See 8.1.2 in EN ISO/IEC 17065:2012.

8.1.3 Option B

See 8.1.3 in EN ISO/IEC 17065:2012 and note.

Required accreditation

[additional] Certification to ISO 9001 shall not replace the accreditation or recognition required under Clause 4.1.1.2.

8.1.4 ClimatePal EU Requirements Applicable to Both Options [additional]

Requirements for Option A and B

Regardless of whether Option A or Option B is used, the certification body shall demonstrate that its management system addresses the additional ClimatePal EU requirements stated in Clauses 8.2 to 8.8. A certification body using Option B is not required to duplicate the ISO/IEC 17065 Option A arrangements where the same requirements are effectively addressed through its ISO 9001-based management system.

8.2 General Management-System Documentation – Option A

8.2.1 Policies and Objectives

See 8.2.1 in EN ISO/IEC 17065:2012.

Management system option A

[additional] The policies and objectives shall include fulfilment of the applicable Carbon Removals and Carbon Farming (CRCF) Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358, certification methodologies and ClimatePal EU scheme requirements.

8.2.2 Top-Management

See 8.2.2 in EN ISO/IEC 17065:2012.

8.2.3 Management Representative

See 8.2.3 in EN ISO/IEC 17065:2012.

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8.2.4 Management-System Documentation

See 8.2.4 in EN ISO/IEC 17065:2012.

Management-system references

[additional] The management-system documentation shall include or reference the applicable legislation, certification methodologies, ClimatePal EU programme documents, accreditation rules, technical interpretations, templates and internal procedures.

8.2.5 Access to Management-System Documentation

See 8.2.5 in EN ISO/IEC 17065:2012.

8.3 Control of Documents – Option A

See 8.3.1 - 8.3.2 in EN ISO/IEC 17065:2012 and note.

Controlled document scope

[additional] The document-control process shall expressly cover:

a. applicable Union and national legislation;

b. certification methodologies;

c. ClimatePal EU programme documents;

d. accreditation rules;

e. audit and certificate templates;

f. technical interpretations; and

g. internal procedures.

8.4 Control of Records – Option A

See 8.4.1 and 8.4.2 in EN ISO/IEC 17065:2012.

Retention controls

[additional] Record-retention controls shall implement Clause 7.12.3 of this document and any additional retention requirements imposed by the relevant national accreditation body or recognition authority.

8.5 Management Review – Option A

8.5.1 General Management Review

8.5.1.1 Planned Management Review

See 8.5.1.1 in EN ISO/IEC 17065:2012.

8.5.1.2 Management-Review Records

See 8.5.1.2 in EN ISO/IEC 17065:2012.

8.5.2 Review Inputs

See 8.5.2 in EN ISO/IEC 17065:2012. For validation and verification management review, see also 11.2 in EN ISO/IEC 17029:2019.

ClimatePal review inputs

[additional] Management-review inputs shall include, as applicable:

a. results of ClimatePal EU monitoring;

b. findings of accreditation bodies and competent authorities;

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c. performance of external validation and verification resources;

d. ClimatePal EU training and methodology-authorisation status;

e. changes to Carbon Removals and Carbon Farming (CRCF) Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358, certification methodologies and ClimatePal EU requirements;

f. certificate suspensions and withdrawals;

g. registry discrepancies;

h. identified fraud or irregularities; and

i. resource needs arising from the ClimatePal EU certification scope.

8.5.3 Review Outputs

See 8.5.3 in EN ISO/IEC 17065:2012.

Management-review outputs

[additional] Management-review outputs shall additionally address decisions and actions concerning ClimatePal competence, impartiality controls, scheme implementation, registry information and resources required to maintain the approved certification scope.

8.6 Internal Audits – Option A

8.6.1 Internal-Audit Procedure

See 8.6.1 in EN ISO/IEC 17065:2012 and note. For validation and verification internal audits, see also 11.3 in EN ISO/IEC 17029:2019.

Internal audits

[additional] Internal audits shall verify fulfilment of the applicable Carbon Removals and Carbon Farming (CRCF) Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358, certification methodologies and ClimatePal EU scheme requirements in addition to ISO/IEC 17065:2012 and the certification body's own management-system requirements.

8.6.2 Internal-Audit Programme

See 8.6.2 in EN ISO/IEC 17065:2012.

Internal audit coverage

[additional] The internal-audit programme shall cover all ClimatePal EU certification functions, technical scopes, relevant locations and external resources within the defined audit cycle. It shall take account of ClimatePal EU monitoring results, certificate-status trends, complaints, non-conformities and changes to applicable certification methodologies.

8.6.3 Frequency

See 8.6.3 in EN ISO/IEC 17065:2012.

8.6.4 Internal-Audit Conduct and Follow-Up

See 8.6.4 in EN ISO/IEC 17065:2012.

8.7 Corrective Actions – Option A

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8.7.1 Identification and Management of Non-Conformities

Corrective actions

See 8.7.1 in EN ISO/IEC 17065:2012.

8.7.2 Elimination of Causes

See 8.7.2 in EN ISO/IEC 17065:2012.

8.7.3 Proportionality of Corrective Actions

See 8.7.3 in EN ISO/IEC 17065:2012.

8.7.4 Corrective-Action Process

See 8.7.4 in EN ISO/IEC 17065:2012. For validation and verification corrective action, see also 11.4 in EN ISO/IEC 17029:2019.

External findings follow-up

[additional] Findings raised by ClimatePal EU, the national accreditation body, competent authorities or the European Commission shall be addressed through the certification body's corrective-action process, including root-cause analysis and verification of effectiveness.

8.8 Preventive Actions – Option A

Preventive actions

8.8.1 Identification of Potential Non-Conformities

See 8.8.1 in EN ISO/IEC 17065:2012.

8.8.2 Proportionality of Preventive Action

See 8.8.2 in EN ISO/IEC 17065:2012.

8.8.3 Preventive Action Process

See 8.8.3 in EN ISO/IEC 17065:2012 and note.

Preventive action

[additional] Preventive action shall additionally consider, as applicable:

a. emerging impartiality risks;

b. competence gaps;

c. changes in Carbon Removals and Carbon Farming (CRCF) Regulation (EU) 2024/3012 and Commission Implementing Regulation (EU) 2025/2358, or certification methodologies;

d. audit-quality trends;

e. recurring operator findings;

f. registry discrepancies;

g. fraud risks;

h. external-resource performance; and

i. information from complaints and ClimatePal EU monitoring.

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8.8.4 Risks and Opportunities Affecting Validation and Verification [additional]

See 11.5 in EN ISO/IEC 17029:2019.

Risk prevention

The certification body shall identify and address risks and opportunities that may affect the competence, consistent operation and impartiality of its ClimatePal EU validation and verification activities.

Risk-treatment planning

The certification body shall plan:

a. actions to address the identified risks and opportunities;

b. how those actions will be integrated into its management system; and

c. how the effectiveness of those actions will be evaluated.

Risk acceptance threshold

The certification body shall evaluate each identified risk using documented likelihood and impact criteria. A risk rated above the certification body's defined acceptance threshold shall have a documented owner, action, completion date and effectiveness check. Any risk capable of compromising impartiality, required competence, the applicable assurance level or the validity of a certification decision shall be reduced to an acceptable level before the affected activity is performed.

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