# QP-02: Guidelines for Validation and Verification Bodies (VVBs)

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# Copyright

# 1 Introduction

The defined terms used in this document shall have the same meaning as in the C-Capsule Code, unless the context requires otherwise. The C-Capsule Code can be found using the following link: https://c-capsule.com/documents.

As part of C-Capsule Limited's (C-Capsule) commitment to maintaining the highest standards of integrity and transparency in carbon removal, C-Capsule has established comprehensive procedures for the oversight of Validation and Verification Bodies (VVBs). These procedures ensure that the VVBs operate independently, meet rigorous quality standards, and contribute to the credibility of all Carbon Removal Units (CRUs). This document serves to outline the requirements for VVBs as well as guidelines for the execution of tasks given to VVBs.

# 2 Accreditation Process

A VVB must be an Accredited Entity. The Accreditation process for a VVB is as follows:

1. Complete and submit the Validation and Verification Bodies application form, which can either be found at https://c-capsule.com/documents or will be provided on request to email address: info@c-capsule.com

   A VVB should be able to demonstrate accreditation under:

   - ISO 14065; or
   - the UNFCCC Clean Development Mechanism; or
   - the Paris Agreement Crediting Mechanism Article 6.4.

   Where a VVB is unable to demonstrate accreditation, the I-TRACK Foundation may approve Accreditation if the VVB can demonstrate adequate competencies relevant to the methodologies they are validating against and compliance with the guidelines of ISO 19011. The approval will remain in effect on an interim basis subject to the VVB progressing towards accreditation of a relevant standard.

2. C-Capsule will validate the completed Validation and Verification Bodies application form. Valid forms are sent on to the Advisory Council. Invalid forms are sent back to the applicant VVB.

3. The Advisory Council will validate the completed Validation and Verification Bodies application form. Valid forms are sent on to the I-TRACK Foundation for final approval. Invalid forms are sent back to the applicant VVB.

4. The I-TRACK Foundation reviews the Validation and Verification Bodies application form for final approval. Forms that do not receive final approval are sent back to the applicant VVB.

# 3 Guidelines for Verification and Validation Services

The following principles must be adhered to when a VVB is completing Facility audits and verification of CRUs.

## 3.1 Peer Review

At least two approved auditors must be involved in the validation and/or verification of each Facility to ensure a thorough peer review process.

## 3.2 Procedure

- The VVB must assign at least two independent and accredited auditors to each Facility. One auditor serves as the primary validator/verifier, while the second performs a peer review of the validation/verification report.
- The peer review process must include a detailed assessment of the Facility's methods, baseline setting, emission reductions/removals, and adherence to the designated methodology.
- Both individuals must sign off on the final report before submission to the C-Capsule Registry, ensuring accountability for the assessment.

## 3.3 Independence

VVBs must demonstrate independence from C-Capsule, the carbon removal market, and the Facilities being validated and/or verified. This includes not being involved in the production, buying, and/or selling of carbon credits, and avoiding relationships with market players such as Facility owners, participants, or other market entities. This is crucial to ensure unbiased and objective assessments.

To meet this requirement, a VVB must:

- Provide attestation within the Validation and Verification Bodies application form showing they are free from conflicts of interest, including financial, operational, or personal interests, with respect to C-Capsule, Registrants, and the market.
- Sign a declaration of independence (included within the Validation and Verification Bodies application form) prior to engaging in validation or verification activities. This ensures there are no business or financial ties with C-Capsule, Registrants, or Participants, and no vested interest in any other Facilities which may affect the independence of the VVB.
- Submit organisational charts and ownership structures to prove that no affiliations exist with entities involved in the Facility.

## 3.4 Site Visits

Site visit requirements are dependent on the methodology associated with a given Facility. To ease the burden on Registrants, a site visit may not be required if the VVB determines it to be unnecessary, based on the outcome of the audit risk assessment and requirements of ISO 14064-3. In these cases, a remote visit via video call may suffice. Whether in-person or via video call, site visits must include inspection of Facility activities, interviews with Facility personnel, and review of physical and operational records. The VVB must document the site visit, providing photographic evidence and detailed reports on observed activities and infrastructure.

## 3.5 VVB Rotation

A VVB is permitted to validate a facility for up to three consecutive years, including all verifications within this timeframe. After three years, a new and different VVB must be appointed.

## 3.6 Quality Assurance

Regular monitoring of VVB performance is conducted by C-Capsule. All validation and verification reports are checked independently by C-Capsule for compliance with all appropriate standards, including but not limited to, the Absolute Climate Standard, the Absolute Climate Validation and Verification Standard, the C-Capsule Code, and ISO 14064-3. The Absolute Climate Standards can be found here: https://www.absoluteclimate.com/. At the submission of any audit report, C-Capsule ensures that the VVB conflict of interest declarations are up to date and compliant with requirements given in this document and QP-02 and that accreditation statuses are up to date and valid (e.g. in-line with IS0 14065).

C-Capsule regularly monitors complaints received via the complaint procedure, as set out in the C-Capsule code, to assess the conduct of VVBs. Spot checks are conducted on validation and verification reports without notice. Ad-hoc evaluations can be triggered under the following circumstances:

- Routine reviews of validation and verification reports raise concerns about quality and compliance.
- Routine reviews of conflict of interest declarations raise concerns of new and/or existing conflicts.
- Routine monitoring of the complaint process uncovers repeated and unresolved breaches of the C-Capsule code, the I-TRACK Standard, and/or other relevant standards.
- Where applicable, routine reviews of the accreditation status reveal that the VVB is not deemed competent under an appropriate accreditation scheme (e.g. ISO 14065).

If spot checks identify quality issues, C-Capsule will initiate a corrective action process with the VVB, which may include revalidation or re-verification, depending on the severity of the issue. VVBs repeatedly failing to meet quality standards will be subject to suspension or removal from the list of Accredited Entities.

VVBs may only perform validation and/or verification activities within the sectoral scope for which they have been Accredited.

## 3.7 C-Capsule's Responsibilities

To ensure the greatest amount of independence between Registrants and VVBs, C-Capsule fulfills certain responsibilities to avoid misaligned incentives. C-Capsule assigns VVBs to Facilities to prevent Registrants seeking out the least rigorous VVB. C-Capsule ensures that payments for VVB services are not made by Registrants or Facility owners.