



Publication Date:
05/07/2024

Version:
V1.1

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PROGRAMME

Validation & Verification Procedure

SUMMARY

This document describes ERS's requirements for Validation and Verification Bodies (VVBs), including accreditation and guidelines on how to conduct Validation and Verification. This procedure is based on ISO 14064-3 and ISO 14065, including ISO 17029. Specific requirements are added to ensure Projects meet ERS's Programme and Methodology criteria.



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Introduction

NORMATIVE REFERENCES

This document must be read in conjunction with the following documents:

- [ERS Programme](#)
- [Registry Procedures](#)
- [Anti-Fraud Policy](#)

TEMPLATES

This document is linked with the following templates:

- [Project Design Document](#)
- [Validation Report](#)
- [Verification Report¹](#)
- [VVB Performance Evaluation](#)
- [Project Mandate - Validation](#)
- [Risk Assessment Matrix](#)
- [Pre-submission Activities Report](#)
- [Developer Due Diligence](#)
- [Declaration of Interest](#)

DEFINITIONS

1. Validation is a third-party evaluation conducted following the Project Design Review. Its principal aim is to review the Project's Provisional [Project Design Document](#) (PDD) and its compliance with the ERS Programme and the applied Methodology.

¹As of this version of the Programme, the Verification Report template has not yet been included.



2. Verification is a third-party evaluation conducted every two or four years throughout the Project's crediting period. Its principal objective is to verify the information reported annually by Developers, ERS' GHG removals calculations, and the Project's adherence to its initial PDD.
3. Validation and Verification Bodies (VVBs) are:
 - 3.1. Suitably qualified institutions or organisations accredited by the ERS Secretariat following the *Accreditation Process*;
 - 3.2. External and independent of ERS.

GENERAL REQUIREMENTS

1. Mandates

- 1.1. Validation and Verification Bodies must be accredited and onboarded by the ERS Secretariat before performing Validation or Verification on ERS Projects. More details can be found in the *VVBs' Accreditation* section.
- 1.2. VVBs are mandated by the ERS Secretariat to perform Validation and/or Verification and must report to both the Secretariat and the Developer.
- 1.3. The same VVB cannot be mandated to audit the same Project more than two consecutive times.

2. Execution

- 2.1. Validation and Verification schedules are subject to the rules established in the *Programme-Specific Requirements* section.
- 2.2. To perform Validation or Verification, VVBs must follow the process according to the requirements set out in the *Validation and Verification Process* section.



3. Alignment with ISO Standards

- 3.1. Validation and Verification must be performed in conformance with ISO 14064-3 and ISO 14065.
- 3.2. VVBs must confirm the accuracy of reported data to a reasonable level of assurance, according to ISO 14064-3 definitions.
- 3.3. VVBs must follow ISO 14064-3 general principles, namely:
 - 3.3.1. **Impartiality.** VVBs must design and execute the Verification/Validation engagement to be objective and minimise bias.
 - 3.3.2. **Evidence-based approach.** VVBs must employ a rational method for reaching reliable and reproducible conclusions, based on sufficient and appropriate evidence.
 - 3.3.3. **Fair presentation.** VVBs must report all significant obstacles encountered during the process and unresolved, diverging opinions among verifiers or validators.
 - 3.3.4. **Documentation.** VVBs must ensure the documentation establishes the basis for the conclusion and conforms to the criteria.
 - 3.3.5. **Conservativeness.** When assessing comparable alternatives, VVBs must adopt a conservative approach to decision-making to ensure the selection of the most appropriate alternative.
- 3.4. VVBs must maintain an internal Quality Management System aligned with ISO 14064-3 principles:
 - 3.4.1. **Policies and Responsibilities.** VVBs must strive to maintain clear policies related to Validation and Verification, including clarity in roles and decision-making processes.



- 3.4.2. **Internal Audits.** VVBs must undergo regular audits to help identify areas where processes may not conform to planned arrangements, ISO requirements, or the organisation's own requirements.
- 3.4.3. **Corrective Actions.** VVBs must strive to identify any non-conformities, take appropriate actions to address them, and manage the results of these actions.
- 3.4.4. **Risks and Opportunities.** VVBs must identify, assess, and address risks and opportunities related to their activities, including potential conflicts of interest or biases.
- 3.4.5. **Documented Information.** VVBs must maintain and control documented information, ensuring it is adequately protected, accessible when needed, and kept up to date.
- 3.4.6. **Management Review.** Top management should periodically review the Quality Management System to ensure its continuing suitability, adequacy, and effectiveness.

4. Application

- 4.1. This Procedure may vary depending on the national context. Should there be any conflict between the Validation and Verification Procedure and national regulations, the VVB must notify the ERS Secretariat within 10 business days. Any deviations must be duly reported in the [Validation/Verification Report](#).



Programme-Specific *Requirements*

VVB EXPERTISE

1. VVB organisation must hold valid 14064-3 and ISO 14065 accreditations delivered by a recognised international accreditation standard.
2. VVB audit teams shall demonstrate knowledge and skills in:
 - 2.1. The field of ecology, and more specifically, ecosystem restoration and ecosystem services;
 - 2.2. Remote sensing and earth observation;
 - 2.3. Anthropology and community-based projects;
 - 2.4. Sustainable development.
3. If VVBs' internal resources cannot demonstrate sufficient knowledge and skills in these domains, they shall engage independent experts or consultants.
 - 3.1. Experts and consultants involved in a Validation or Verification process must be included in the [Project Mandate](#) and their participation must be documented in the corresponding [Validation/Verification Report](#).
 - 3.2. Experts allocated to a Validation/Verification must operate under the sole responsibility of the VVB.
4. Refer to the [Validation and Verification Bodies Accreditation](#) section for more information about VVB organisation requirements.



VALIDATION

1. Schedule

- 1.1. Validation must occur after the Project Design Review.
- 1.2. Validation must be completed within a four-month period. This implies that the time span from signing the Project Validation Mandate to publishing the Validation Report on the ERS Registry must not exceed four months.

2. Requirements

- 2.1. VVBs must validate:
 - 2.1.1. That Projects meet the criteria enunciated in the [ERS Programme](#). This includes but is not limited to, alignment with the General Project Requirements and the Certification Procedure.
 - 2.1.2. That Projects meet the criteria enunciated in the Methodology applied. The Project Design Document and its affiliated documents must contain all information to demonstrate that the requirements on Eligibility Criteria, Ecological Recovery, Carbon, Livelihoods and MRV procedure are met.
 - 2.1.3. The estimations of GHG removals according to the Methodology applied.

VERIFICATION

1. Schedule

- 1.1. Verification must occur every two (2) to four (4) years. This implies that the interval between the publication of a Verification Report and the signing of the subsequent Project Verification Mandate must not exceed two (2) or four (4) years, depending on the chosen MRV schedule.



- 1.2. Projects that underwent Pre-submission activities must perform Verification in tandem with Validation to assess the interventions declared as Pre-submission.
- 1.3. Verification must be completed within a four-month period. This implies that the time span from signing the Project Verification Mandate to publishing the Verification Report on the ERS Registry must not exceed four months.

2. Requirements

- 2.1. If Verification is performed in tandem with Validation, VVBs must verify the [Pre-submission Activities Report](#).
- 2.2. Throughout the crediting period, VVBs must verify:
 - 2.2.1. Project's Annual Reports;
 - 2.2.2. Biennial GHG quantification reports from ERS;
- 2.3. Additionally, every four years, as part of the Adaptive Management, VVBs must verify all updated documents, namely:
 - 2.3.1. The updated [Project Design Document](#);
 - 2.3.2. The updated [Risk Assessment Matrix](#);
 - 2.3.3. The updated [Developer Due Diligence](#).
- 2.4. Verifications must always refer to the latest version of the ERS Programme and methodologies.

SCHEDULED DEVIATIONS

1. Dispute resolutions

- 1.1. ERS may require a VVB to resolve a dispute between ERS and a Developer prior to the scheduled Verification. This is applicable, for



instance, when ERS deems the documentation submitted by the Developer inadequate to prove the nature of loss events.

2. Extensions

- 2.1. Developers can request ERS' Certification Agent to extend the Verification interval to four years instead of two.
 - 2.1.1. The request must be made via email at least one hundred and eighty (180) days before the next Verification scheduled date.
 - 2.1.2. The request must include a justification for the extension's request.
- 2.2. If the Certification Agent deems there is no material risk associated with a delayed Verification, they can grant the request via email. Material risk includes but is not restricted to:
 - 2.2.1. Delay superior to two weeks (from the grace period) in sending an Annual Report in the last four years.
 - 2.2.2. Any grievance filed against the Project in the last eight years.
 - 2.2.3. Any loss events or reversal in the last two years.
 - 2.2.4. Suspicion by the Certification Agent of the Project's rightful evolution.
- 2.3. The Certification Agent must publish an Extension Note on the Project's page in the Registry. The Note must contain the request's justification, ERS' decision, the decision's justification, and the new Verification date (if applicable).
- 2.4. The Verification's extension can not be applied to years where the Project is undergoing Adaptive Management (years four, eight, twelve, sixteen, and subsequently).



3. Delays

- 3.1. Verification can be delayed up to twelve months due to the following circumstances:
 - 3.1.1. Inaccessibility of the Project Area due to environmental conditions, travel restrictions, conflicts, or logistical challenges.
 - 3.1.2. Regulatory or Policy Changes implying sudden changes in national environmental regulations or carbon accounting frameworks.
 - 3.1.3. Other reasons demonstrated as justifiable by the VVB to the ERS Secretariat.
- 3.2. If Verification has not been completed after the initial twelve-month grace period, the VVB must submit a new justification to ERS, including the expected length of the postponement. If ERS deems the justification insufficient, the Project must be halted.

REMOTE AUDIT POLICY

1. With major technological advances embedded into the data collection processes of the Project, ERS considers that remote assessments can be reliable alternatives to physical site visits. Notably, ERS remote audit policy:
 - 1.1. Reduces VVBs' travel time, costs, and emissions.
 - 1.2. Facilitates the identification of Projects' risks and the verification of their impacts through more frequent and less expensive audits.
2. A comprehensive and effective remote audit must include:
 - 2.1. **Document Review.** The VVB must review all the Project's reports, documentation, letters and shapefiles to assess compliance with the [ERS Programme](#) and the Methodology.



- 2.2. **Data Verification.** The VVB must cross-check the reported data against external sources to ensure accuracy and consistency. This includes verifying the completeness, traceability and reliability of the data collection processes and assessing the adequacy and quality of the Project's data.
3. Remote audits must not lower the quality of the outputs. Site visits must be performed under the following circumstances:
 - 3.1. An initial Verification.
 - 3.2. There is suspicion of false data in the documentation or Project documentation is poorly done, with missing or unreliable data, geolocation, and/or supporting images, not allowing a reasonable level of assurance.
 - 3.3. There is suspicion of breaching one or more of ERS' requirements.
 - 3.4. A material grievance complaint has been filed since the last Verification.
 - 3.5. Stakeholders are inaccessible via remote channels.
 - 3.6. Material changes in scope or boundary of reporting, i.e. Project expansion.
4. If the VVB decides to perform a site visit, it must:
 - 4.1. Communicate its decision to the Secretariat in the [Project Mandate](#).
 - 4.2. Schedule a site visit with the Developer.
 - 4.3. Collect relevant data during the site visit, including GPS coordinates, photographs, interviews and supporting documents. These on-site observations, measurements, and records must be reported in the final [Validation/Verification Report](#).



- 4.3.1. If interviews are conducted with local populations or Stakeholders, they must be conducted in the local language or dialect.
- 4.3.2. The VVB team must hire a translator if it does not speak the local language or dialect.



Validation and Verification

Process

AUDIT PROCESS²

1. Pre-engagement

- 1.1. **Pre-selection.** The ERS Secretariat pre-selects VVBs to perform Validation or Verification and provides them with the Project summary, type of engagement, and scope.
- 1.2. **Pre-agreement.** The VVB must review the information provided. Following such review, the VVB must either accept or decline and provide a provisional team composition.
- 1.3. The final VVB selection is made by ERS based on the following criteria:
 - 1.3.1. Availability on the mentioned time frame;
 - 1.3.2. Audit Team knowledge and skills, based on auditors' CVs, with a focus on local knowledge (including language proficiency and experience with comparable projects);
 - 1.3.3. Day rates of the Audit Team members;
 - 1.3.4. Previous Performance Evaluation(s).

2. Planning and Engagement

- 2.1. Upon the ERS Secretariat's selection of the VVB, the [Project Mandate](#) is used to initiate engagement between ERS and the chosen VVB for Validation or Verification.

²This section is adapted from the ISO 14064-3 document.



- 2.1.1. The Project Mandate acts as a contract and a detailed outline of the Validation or Verification process.
- 2.1.2. ERS must pre-fill:
 - Project details: Name, ID, Project Design Document, Risk Matrix, Developer Due Diligence;
 - Validation details: Context, Objective, Engagement Type, Scope, Level of Assurance;
 - References: Programme version, Methodology version, Validation & Verification Procedure version.
- 2.1.3. The VVB must complete:
 - The Strategic Analysis as defined by ISO 14064-3;
 - The Risk Assessment as defined by ISO 14064-3;
 - The team composition, along with the Validation/Verification Fees;
 - Evidence-gathering activities;
 - If applicable, detailed information on site visits, including a description of the activities, costs, material and preliminary schedule or timeline;
 - The general Safeguards Declaration section.
- 2.1.4. Upon reception of the Project Mandate, the VVB must complete it within twenty (20) business days.
- 2.2. In addition, each member of the VVB team selected for the Validation or Verification must disclose all real and potential conflicts of interest, including significant transactions or relationships that might cause a conflict, via the [Declaration of Interest](#) form.



3. Validation/Verification Execution

- 3.1. The VVB must perform the Validation/Verification activities as per the Audit Plan mentioned in the [Project Mandate](#).
 - 3.1.1. The VVB can revise the Audit Plan during the Validation/Verification execution if necessary.
 - 3.1.2. Any revisions to the Validation/Verification plan must be documented internally, including the reasons for the changes, and communicated to the ERS Secretariat.

4. Completion

- 4.1. Upon executing the Validation/Verification, the VVB is responsible for completing the [Validation/Verification Report](#) and sharing it with both the ERS Secretariat and the Developer. The report must include:
 - 4.1.1. The Validation/Verification process, including details on the audit team, the methods employed and the evidence-gathering activities.
 - 4.1.2. The list of findings, including photographs, data summaries, or any other supporting evidence.
 - 4.1.3. A list of all observed non-compliances outlining the steps to be taken and the expected outcomes of the corrective actions. Recommendations associated with non-compliance are categorised as follows:
 - **Corrective Action Request (CAR)**. The VVB considers that the applicable ERS requirements still need to be met. Any CAR must be addressed before issuing a Validation/Verification decision.
 - **Clarification Request (CL)**. The VVB considers that the information is insufficient or not clear enough to determine if the ERS requirements have been met. Any CL must be



addressed before issuing a Validation/Verification decision.

- **Forward Action Request (FAR).** The VVB expresses the need to execute an action that, while not mandatory, is considered essential for compliance in future audits.
- **Project Termination.** The VVB finds evidence that the Project violates one or more “blocker risks” or safeguards. In such cases, ERS reserves the right to reject or withdraw certified status. Refer to *Project Failure* in the [ERS Programme](#) for more details.

4.1.4. The VVB’s conclusion and a first opinion (unmodified, modified, adverse).

5. Corrective Action Plan

5.1. Upon receiving the [Validation/Verification Report](#), the Developer must provide a Corrective Action Plan within fifteen (15) business days to tackle the issue(s) raised by the VVB. The plan must also establish a system for monitoring its implementation.

5.1.1. **Approval.** If the VVB deems the Corrective Action Plan sufficient to clear all CARs and CLs, the Report can be sent for Review.

5.1.2. **Rejection.** If the VVB deems the Corrective Action Plan insufficient to clear all CARs and CLs, the Developer must submit an updated Plan integrating the VVB’s feedback and modify it until it is validated by the VVB.

- The Developer must submit the revised Corrective Action Plan within fifteen (15) business days.
- The Developer must submit as many Corrective Action Plans as necessary until obtaining the VVB’s Validation/Verification.



6. Independent Review

- 6.1. The VVB must send the drafted [Validation/Verification Report](#) to reviewers.
 - 6.1.1. Reviewers are individuals appointed by the VVB who were not involved in the validation or verification process and must cross-check the initial conclusions and statements.
 - 6.1.2. Reviewers can ask for clarifications at any point.
- 6.2. The Independent Review must confirm that:
 - 6.2.1. Validation/Verification activities have been completed per the agreement and the Validation/Verification Procedure.
 - 6.2.2. Evidence to support the decision is sufficient and appropriate.
 - 6.2.3. Significant findings have been identified, resolved, and documented.

7. Final Opinion

- 7.1. Upon completing the Validation/Verification review, the VVB must issue its final opinion to confirm the claims or to suspend the Project's activities (unmodified, modified, adverse).
 - 7.1.1. If Validation/Verification is successful, the Project documentation, along with the [Validation/Verification Report](#), is published on the [ERS Registry](#), and Restoration Units can be issued as defined by the [Registry Procedures](#).
 - 7.1.2. If Validation/Verification is unsuccessful, the Project's status is updated on the [ERS Registry](#), and the issuance of Restoration Units is halted as defined by the [Registry Procedures](#).



8. Handling of appeals & complaints

- 8.1. VVBs must have a documented process to receive, evaluate and make decisions on appeals & resolve complaints.
- 8.2. VVBs must update the [Validation/Verification Report](#) in case changes and new discoveries happen after the report publication. The new version of the Report must be published on the [ERS Registry](#).



Validation and Verification

Bodies *Accreditation*

ELIGIBILITY CRITERIA

The ERS Secretariat must ensure accredited VVBs demonstrate the following qualifications and skills:

1. **Legal entity.** VVBs must be an entity registered under applicable national or international law to function legally, enter into contracts, and make decisions independently.
2. **Accreditation.** VVBs must hold valid ISO 14064-3 and 14065 accreditations delivered by a recognised international accreditation standard (e.g. IAF, ANSI).
3. **Track record and competence.** VVBs must have practical experience in the Validation/Verification of carbon removal, ecological recovery, and livelihoods. VVBs must furnish evidence of their prior engagements with other entities in the relevant sectoral scope, showcasing their track record.
4. **Language proficiency.** All team members involved in Validation/Verification must be proficient in English.
5. **Judicial record.** VVBs must not have any open judicial process for malpractice, fraud, and/or other activity incompatible with their functions as independent auditing bodies.
6. **Impartiality.**
 - 6.1. VVBs must have a publicly available impartiality policy.



- 6.2. VVBs are required to sign ERS's [Declaration of Interest](#) when submitting the [Project Mandate](#).

VVB ACCREDITATION PROCESS

1. First contact

- 1.1. VVBs can contact the ERS Secretariat via the contact form on the [ERS website](#).
- 1.2. The ERS Secretariat must review the contact form, and if the VVB complies with the [Eligibility Criteria](#), a first call is scheduled. During the first call, the Secretariat exposes ERS' expectations and details about the contractual relationship.

2. Application

- 2.1. The ERS Secretariat sends the VVB an Application Form for accreditation. This form consists of a series of questions designed to confirm the VVB's adherence to the criteria outlined in the Requirements section.
- 2.2. The ERS Secretariat evaluates the completed Application Form for compliance.

3. Screening

- 3.1. The ERS Secretariat sends the Third-Party Screening Questionnaire to the VVB seeking accreditation.
- 3.2. The ERS Secretariat evaluates the completed Questionnaire for compliance following the procedure described in the [Anti-Fraud Policy](#).


4. Training & Test

- 4.1. The ERS Secretariat provides structured training that covers all topics



relevant to Validation/Verification. These modules include:

- 4.1.1. **ERS Programme:** Provides in-depth training on ERS's specific templates, procedures, and guidelines. This training includes a comprehensive review of Programme documentation to ensure that VVBs fully understand ERS's requirements.
- 4.1.2. **M001:** Provides in-depth training on ERS' MRV and three-pillar approach and their related templates, procedures, and guidelines. This training includes a thorough review of the M001 documentation to ensure that VVBs fully understand ERS's requirements.
- 4.1.3. **Reporting and Documentation.** Provides in-depth training on ERS' documentation practices, including data collection, record keeping, and reporting requirements.
- 4.2. Auditors planned as Audit Team Leaders must follow the training to be able to perform Validation or Verification.
- 4.3. A knowledge test is sent to every applying auditor to verify their knowledge of the Standard. All auditors must pass the knowledge test to perform Validation or Verification.

 The content of the knowledge test and its supporting tools remain at the discretion of ERS.

5. Onboarding

- 5.1. **Agreement.** A Legally Binding Agreement must be signed between ERS and the applying VVB.
- 5.2. **Fees.** The VVB organisation must pay an invoice of 1500€ to cover the costs related to the accreditation process.



6. Accreditation

- 6.1. Once the VVB successfully signs the Legally Binding Agreement and the invoice is paid, the ERS Secretariat considers the VVB accredited and must list it on the website.
- 6.2. Every VVB is classified into one of three specific statuses: Pending, Active, or Inactive. Each status is characterised as follows:
 - 6.2.1. Pending: is assigned to VVBs currently undergoing the accreditation process, either for initial approval or re-approval.
 - 6.2.2. Active: is assigned to accredited VVBs that have undergone successful Performance Evaluations, as described in the Performance Evaluation section.
 - 6.2.3. Suspended: is assigned to VVBs that are accredited but that failed to pass the Performance Evaluation.
- 6.3. The list of accredited VVBs is available on the [ERS website](#).

7. Communication

- 7.1. The ERS Secretariat can be contacted at secretariat@ers.org to address inquiries, technical issues, or concerns.
- 7.2. Regular meetings or webinars are scheduled with the VVB network to facilitate information sharing, address questions, and provide information on Programme updates.

8. Continuous Learning

- 8.1. ERS promotes continuous learning by encouraging VVBs to stay updated with the latest industry advancements, methodologies, and standards. VVBs are encouraged to participate in relevant workshops, seminars, and conferences to enhance their expertise.
- 8.2. Training sessions for refresher courses are provided biennially, while



updates are offered annually to ensure that VVBs remain current and informed about Programme developments and requirements.



Validation and Verification Bodies *Performance Evaluation*

The Secretariat supervises the quality of Validation and Verification carried out by accredited VVBs. This oversight enables continuous improvement and upholds the quality of audits conducted under the Standard.

OVERVIEW

1. **Objective.** Assessing the performance of VVBs under their mandates delivered by the Secretariat
2. **Scope.** Evaluating VVBs' alignment with the Validation and Verification Procedure, their effectiveness in assessing a Project's adherence to ERS' requirements, and their overall competency in conducting Validation/Verification activities and reporting them.
3. **Data access.** The ERS Secretariat must have access to all project documentation and data reviewed by the VVB and any supporting documents the VVB used to issue its final statement.
4. **Prior notice.** VVBs receive a notification thirty (30) consecutive days prior to a performance evaluation.

OCCURRENCE

1. **First audit evaluation.** In-depth evaluation performed after the VVB's first Validation or Verification.



2. **Periodic evaluation.** In-depth evaluation performed biennially to ensure a consistent and ongoing performance assessment.
3. **Occasional evaluation.** The ERS Secretariat reserves the right to evaluate VVBs when concerns, notifications, or complaints arise or at its own discretion.

PROCESS

The ERS Secretariat sends the VVB a performance evaluation request specifying the required documents and data, which must be provided within fifteen (15) working days.

1. **Data collection.** The ERS Secretariat must request to the VVB:
 - All final Validation/Verification reports;
 - A list and CVs of all VVB team members who participated in Validation/Verification;
 - Data sets used (including photos, interviews, imagery, scientific references, and others);
 - Assessment records and any additional evidence provided by the VVBs to corroborate their work.
2. **Desktop Performance review.** The ERS Secretariat reviews the collected data. The assessment must be based on the following criteria:
 - 2.1. **Audit Team**
 - Technical competence;
 - Pertinence to the Project and sectoral scope;
 - Independence from the Programme and Project.
 - 2.2. **Validation/Verification Process**



- Adherence to ERS' Validation/Verification procedure;
- Adherence to ISO 14064-3 and ISO 14065 guidelines.

2.3. **Validation/Verification Report**

- Adherence to ERS' reporting templates;
- Accuracy of assessments and calculations;
- Clarity and comprehensiveness;
- Completeness;
- Consistency;
- Peer reviewing;
- Actionability of recommendations.

2.4. **If applicable, Behaviour in the Field**

- Cultural sensitiveness;
- Professionalism;
- Effective communication with the Project's stakeholders.

3. **Stakeholder Interviews.** Interviews must be conducted with the Developer's team and selected Stakeholders to evaluate the VVB's performance, especially on aspects related to the VVB's behaviour in the field. Interviews should corroborate or raise discrepancies from the desktop review findings.
4. **Timeline.** Upon receipt of all requested documentation, the ERS Secretariat has twenty-five (25) working days to conclude the evaluation, including Stakeholder interviews.
5. **Evaluation Report.** The ERS Secretariat must validate the aforementioned criteria and identify any potential discrepancies or concerns. A formal evaluation is issued for each criterion in the [Performance Evaluation Report](#).



DECISION

The ERS Secretariat issues its decision based on findings from the Performance Evaluation.

- 1. Clearance.** If no red flags or breaches to ERS' [Validation & Verification Procedure](#) are identified, the VVB is cleared to maintain its Active status.
- 2. Clarification.** If doubts arise due to unclear documentation, the ERS Secretariat must issue a Clarification Request, to which the VVB has ten working days to respond with an explanation and supporting evidence.
 - 2.1. If the ERS Secretariat considers the response sufficient to prove the VVB can maintain its Active status, it must issue a clearance decision.
 - 2.2. If the ERS Secretariat considers the response insufficient and reasonable doubt persists, a suspension must be applied, and its status must be changed to Pending.
 - 2.2.1. The ERS Secretariat must continue to investigate the VVB to either clear all doubts, resulting in clearance or confirm it, resulting in further suspension or termination.
- 3. Sanction.** If red flags or breaches to ERS' [Validation & Verification Procedure](#) are confirmed or raise reasonable doubt, the VVB is sanctioned, and its status is changed to Suspended. Refer to the [Validation and Verification Bodies Sanctions](#) section for more details.
- 4.** The ERS Secretariat makes all decisions regarding the clearance, clarification, or sanction of the VVBs at its sole discretion.

PUBLIC DISCLOSURE

All Evaluation Reports must be publicly disclosed on the [ERS website](#).



Validation and Verification

Bodies *Sanction*

TERMINATION AND SUSPENSION OF ACCREDITATION

The ERS Secretariat can terminate or suspend VVBs whose evaluation raises reasonable doubt or confirms malpractices or breaches of ERS' [Validation & Verification Procedure](#). The duration of sanctions is determined at the ERS Secretariat's sole discretion on a case-by-case basis.

1. **Suspension.** The VVB is temporarily forbidden from engaging in Validation/Verification.
2. **Termination.** The VVB is forbidden to execute Validation/Verification for at least two years.

GROUNDINGS

1. Grounds for suspension


- 1.1. Unannounced changes to audit teams without prior approval from the ERS Secretariat.
- 1.2. Loss of relevant accreditation outlined in the [Eligibility Criteria](#).
- 1.3. Negligence in the preparation of Validation/Verification reports or audit techniques.
- 1.4. Reasonable doubt that [Validation & Verification Procedure](#) are not being followed.



- 1.5. Reasonable doubt of fraud allegations or deliberately misleading statements.

2. Grounds for termination

- 2.1. Confirmed fraud allegations or deliberately misleading statements.
- 2.2. Persistent issues with performance or inconsistent quality of reports regarding methods, information, or language.
- 2.3. Breach of applicable legislation.
- 2.4. Permanent loss of relevant accreditation outlined in the *Eligibility Criteria*.

 If fraud allegations are confirmed, ERS reserves the right to take the necessary juridical actions to solve the matter when applicable.

SANCTION RESOLUTION

The ERS Secretariat must lift sanctions under the following circumstances.

1. **Suspension.** Suspensions can be lifted under the following conditions:
 - 1.1. Design and implementation of a Performance Improvement Plan.
 - 1.1.1. This can be applied when grounds for suspension are:
 - Unannounced changes to audit teams
 - Loss of relevant accreditation
 - Negligence in the preparation of Validation/Verification reports or audit techniques.



- 1.1.2. The Plan must outline specific actions and timelines for addressing the identified shortcomings.
- 1.1.3. The VVB must submit proof of the Plan's implementation to the ERS Secretariat.
- 1.2. Satisfying Clarification
 - 1.2.1. Applied when grounds for suspension are:
 - 1.2.1.1. Reasonable doubts about fraud allegations
 - 1.2.1.2. Reasonable doubts that [Validation & Verification Procedure](#) are not being followed.
 - 1.2.2. The VVB must submit enough justification and evidence to prove no fraud was committed or that the VVB observes all of ERS' [Validation & Verification Procedure](#).
 - 1.2.3. Suspension must only be halted once all reasonable doubts are cleared.
2. **Termination.** After the two-year sanction period, the VVB might re-apply to become accredited by ERS. In the new accreditation demand, they must prove all reasons for termination were addressed and solved.

PUBLIC DISCLOSURE

All suspensions and sanctions must be publicly disclosed on the [ERS website](#).



Ecosystem Restoration Standard

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