

California Air Resources Board Greenhouse Gas Verification Program: Requirements for Accreditation of Verification Bodies and Verifiers

The California Air Resources Board (ARB) has established and implemented a robust and rigorous Verification program to support greenhouse gas (GHG) reporting. Two critical components are an accreditation program for GHG verification bodies and verifiers consistent with the international ISO 14065 standard and a verifier performance Oversight program to maintain consistency in verification services provided while attaining California's higher standards for performance.

Accreditation of Verification Bodies and Verifiers

The requirements for ARB's accreditation program were originally developed as part of ARB's rulemaking in 2007 requiring the mandatory reporting of greenhouse gas emissions. At that time, there was no national program to accredit GHG verification bodies or individual verifiers. The ARB accreditation program was developed using international best practices as laid out in ISO 14065, which is the standard to which greenhouse gas verifiers need to be accredited. The ISO standards are meant to be guidelines that programs can use to develop and tailor for their own program needs. The standard is program neutral.

ARB's verification accreditation program is consistent with the ISO 14065 standard for accrediting verification bodies. The following list highlights the areas in ARB's verification body requirements that are inclusive of all of the major requirements in the ISO 14065 standard:

- Be a legal entity that can be held accountable;
- Possess an internal conflict of interest policy, mechanisms to monitor, and requirements to remove and control for conflicts if they arise;
- Maintain Liability Insurance;
- Competencies for sectors, if applicable;
- Requirements to form verification teams with appropriate skills for verification of special sectors;
- Take responsibility for any subcontractors potential for conflict of interest with the client and the quality of their work;
- Identify a verification team lead; and
- Maintain record retention requirements.

However, ARB has chosen to advance the requirements for accreditation past the ISO 14065 standard for verification bodies to the level of individual verifiers, or ISO 14066. ARB chose to add such a requirement to ensure a competency standard at a level beyond that required by international best practices. This includes a minimum educational and work experience requirement for individual verifiers. It also includes training and accrediting verifiers as sector specialists. ARB has

developed a training program that builds on international GHG auditing skills and ARB's regulatory requirements for reporting and verification.

ARB does not have the authority to claim that it has accredited a company to the ISO 14065 standard as ARB is not a recognized body within the framework of the International Accreditation Forum (IAF). Bodies within this framework, like ANSI and SCC, accredit individuals, systems, labs, products, and methods. These bodies must develop these programs under the ISO 17011 standard conferred by the IAF. This is a process-related standard that lays out practices for decision-making by committees and requirements for representation on committees making decisions about the accreditation for a specific product, personnel accreditation, etc. As a regulatory agency, ARB has its own statutory, regulatory, and policy requirements for how to conduct a public rulemaking process and how to engage stakeholders during the development of a regulatory accreditation program. As such, ARB would not need to seek a 17011 accreditation from the IAF in order to demonstrate its consistency with the ISO 14065 standard while implementing its verification body accreditation program.

ARB Oversight and Audits of Verifiers

The success of ARB's verification program relies on the oversight of verification bodies, and the integrity and technical skills of accredited verifiers. ARB is committed to continually evaluating the verification bodies' services as specified in the ARB's regulatory requirements and the verification bodies' professional care and conduct to ensure the integrity and consistency of verifications. As part of this oversight process, each reporting year ARB staff audits every active verification body to ensure verifiers are providing high quality verification services. ARB staff also audits verifications of multiple facilities within the same economic sector to ensure consistent verification services are being provided by different verification bodies. Audit findings and observations are sent to verification bodies at the completion of verification services in order for each verification body to take any necessary actions to improve their performance.

In the future, the oversight and audit program will expand to include audits at verification body offices to ensure they maintain the highest professional standards in areas related to technical expertise and competence, verification planning process, impartiality of services, document and communication management, and associated systems.

Conclusion

ARB's verification accreditation program is consistent with the ISO 14065 and the new ISO 14066 standards. ARB supports a rigorous verification oversight and audit program to ensure California verification bodies and individual verifiers continue to meet high standards for verification services.