

TIC Council Recommendations for the Trilogue on the Regulation on Certification of Carbon Removals

The TIC Industry has a long experience in offering services related to carbon emissions reduction based on internationally recognised standards, on-site verifications, and independent review of results, ensuring the trustworthiness of the certifications. The sector is in favour of a system of certification of carbon removals that offers the transparency and reliability that economic actors are expecting from the carbon credits market.

This will need to be complemented by a robust conformity assessment system, with certification at its core, which has the potential to minimise miscalculations, greenwashing and in general enhance trust in the system by economic operators and consumers. **Accredited** independent third-party conformity assessment bodies protect the economic operators that truthfully invested in carbon removals.

Ahead of the envisaged dialogues, we recommend the European Parliament, the Council, and the Commission to take into consideration several proposals for improvement of the original proposal:

- Article 2, definition of ‘certification body’:
 - It explains that a certification body must be an “accredited or recognised conformity assessment body”. The inclusion of the term “**recognised**” can go against creating a level playing field given that the word does not have a legal meaning. We are concerned that this may open the door to non-accredited and then non-supervised certification bodies. Accreditation is the process that ensures that the company responsible for the verification is capable and has all the knowledge and instruments needed to provide the certifications and is at the basis of a solid certification system. The EU has already in place a policy framework for accreditation, under regulation 765/2008, that should be used to accredit all the companies which issue certifications of carbon removals. This would ensure that competences and capabilities are regularly verified across the European Union, thereby safeguarding the quality of inspections. **We therefore propose to either remove the term “recognised” or to further explain it in order to keep the value of accreditation.**
 - The definition also introduces the notion that certification bodies have “**concluded an agreement with a certification scheme**”. This should be further explained or removed without further explanation provided. Conformity assessment bodies, in order to perform the requested certification, must be accredited against a standard or a scheme and follow its rules. The term “agreement” therefore, does not reflect the actual functioning of the sector.
- Article 11.4 says that “certification schemes shall publish a list of the **appointed certification bodies**”. It is important to ask that once the certification body is accredited for CRC-related certification, it is mentioned in the list without additional requirements to comply with. Otherwise, the regulation must specify what is requested to the certification bodies to be mentioned in this list.

[TIC Council](#) is a global association representing over 100 international independent third-party testing, inspection, certification and verification organisations. Testing, Inspection and Certification (TIC) companies cater to a diverse range of industry sectors and a variety of standards and legislation. The industry represents an estimated one million employees across the world with annual sales of approximately USD 200 billion.

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