



VALIDATION AND VERIFICATION MANUAL GREENHOUSE GAS PROJECTS

BIOCARBON CERT[®]

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1 Introduction

This Validation and Verification Manual (VVM) is part of the BioCarbon GHG Crediting Program and establishes the principles, rules, and procedures that Conformity Assessment Bodies (CABs) shall apply when performing validation and verification of GHG mitigation projects.

The Manual ensures consistency with applicable ISO standards (ISO 14064-2, 14064-3, and ISO 14065), supports high standards of technical competence and professional integrity, and enables the issuance of Verified Carbon Credits (VCCs) backed by credible, independent, and evidence-based third-party review.

The VVM serves to operationalize the BioCarbon Standard's requirements regarding additionality, quantification, monitoring, transparency, and permanence. It integrates principles and expectations consistent with globally recognized practices for environmental integrity, independent assurance, and verification rigor, enabling compatibility with regulated and voluntary markets.

2 Object and area of application

The purpose of this Manual is to define the principles, criteria, and procedures that govern validation and verification activities for GHG projects under the BIOCARBON GHG Program.

It applies to all Conformity Assessment Bodies (CABs) approved by BIOCARBON and to all project types eligible under the Program. This includes standalone projects, grouped projects, and mitigation activities in the AFOLU, energy, transportation, and waste sectors.

The Manual sets out the procedural and competency requirements to ensure:

- (a) The integrity, accuracy, and traceability of project assessments;
- (b) Independent, impartial, and consistent performance of validation and verification functions;
- (c) Alignment with internationally recognized standards and practices, including those required for market eligibility and recognition of credits;
- (d) Full compatibility with BIOCARBON's baseline and additionality framework, risk and permanence tools, sustainable development safeguards, and corresponding adjustments mechanisms.

3 Version

This document constitutes Version 3.0, dated June 13, 2025.

This Manual may be updated periodically to reflect evolving scientific knowledge, regulatory developments, or updates to BIOCARBON's governance framework.

Intended users shall refer to the most recent version available on the BIOCARBON website. Unless otherwise specified, updates shall take effect 30 calendar days after publication. Project activities undergoing validation or verification within this transition period may proceed under the version in effect at the time of initiation, provided the timeline is documented and approved by BIOCARBON.

4 Principles

The principles outlined in this section shall guide the application of validation and verification activities carried out by Conformity Assessment Bodies (CABs) under the BIOCARBON GHG Program. These principles are consistent with ISO 14064-3 and the overarching expectations for quality assurance in carbon markets.

Validation and verification processes shall be conducted in accordance with the following principles:

Independence

The CAB shall remain free from conflicts of interest and shall maintain both structural and functional independence from the GHG project and its stakeholders.

Integrity

All activities shall be conducted honestly, ethically, and in full compliance with applicable laws, standards, and professional obligations.

Unbiased Presentation

Validation and verification reports shall accurately reflect findings, including any limitations, unresolved issues, or dissenting opinions, without distortion or omission.

Due Professional Care

CAB personnel shall apply the level of care and diligence required to meet the expectations of users and stakeholders, consistent with the scope, complexity, and risk level of the GHG project.

Professional Judgment

CABs shall exercise sound judgment based on expertise, evidence, and a conservative interpretation of data and assumptions.

Evidence-Based Approach

All conclusions shall be supported by verifiable data, selected through a sampling strategy appropriate to the assurance level and materiality threshold.

Transparency

Processes, criteria, findings, and decisions shall be documented in a clear, traceable, and publicly accessible manner where required by the Program.

Technical Competence

CABs shall demonstrate up-to-date knowledge of relevant standards, methodologies, project types, and sector-specific risks.

Continuous Improvement

Validation and verification outcomes shall feed into corrective and preventive actions where relevant, and CABs shall maintain mechanisms to review and improve internal procedures over time.

These principles underpin the credibility of the BIOCARBON Program's MRV system and support the issuance of Verified Carbon Credits that are real, additional, and represent measurable, conservative mitigation outcomes.

5 Normative references

The following normative references are integral to the application of this Manual and shall be applied as amended from time to time. CABs shall ensure they are using the most current and applicable versions:

- (a) ISO 14064-2: Greenhouse gases — Part 2: Specification with guidance at the project level for quantification, monitoring, and reporting of greenhouse gas emission reductions or removal enhancements;
- (b) ISO 14064-3: Greenhouse gases — Part 3: Specification with guidance for the verification and validation of greenhouse gas statements;

- (c) ISO 14065: Greenhouse gases — Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition;
- (d) BIOCARBON Standard (BCR Standard);
- (e) BIOCARBON Baseline and Additionality Tool, current version;
- (f) BIOCARBON Avoiding Double Counting Tool (ADC);
- (g) BIOCARBON Permanence and Risk Management Tool;
- (h) BIOCARBON Long-Term Management Plan;
- (i) BIOCARBON Sustainable Development Safeguards (SDSs);
- (j) BIOCARBON Standard Operating Procedures (SOP);
- (k) Methodology Development and Approval Procedure (MD&A);
- (l) Relevant national legislation applicable to the host country of the project;
- (m) Guidance and decisions issued by international bodies overseeing crediting mechanisms, as applicable to the program context.

These references collectively ensure alignment with international best practices, consistent application of conservative assumptions, and full compatibility with eligibility criteria for participation in voluntary and regulated carbon markets.

6 Terms and definitions

Unless otherwise specified, the terms used in this Manual shall be interpreted in accordance with the definitions contained in the BCR Standard and the Glossary of the BIOCARBON Program. The following definitions apply specifically to the context of validation and verification under the BIOCARBON GHG Program:

Assurance Level

The degree of confidence that the verifier shall obtain and express in the validation or verification statement. The BIOCARBON Program recognizes two levels: reasonable and limited assurance.

Clarification Request (CL)

A request issued during the validation or verification process when the information submitted is insufficient, ambiguous, or unclear for determining compliance. A CL does not constitute a non-conformity.

Client

Organization or person that requests validation or verification.

Conformity assessment

Demonstration that specified requirements relating to a product, process, system, person, or body are fulfilled.

Conformity Assessment Body (CAB)

A legal entity, or defined part of such an entity, that performs validation and/or verification activities of GHG projects under the BIOCARBON Program and is accredited in accordance with ISO 14065.

Conformity assessment system

Rules, procedures, and management of a conformity assessment. Conformity assessment systems may operate at the international, regional, national, or sub-national level.

Corrective Action Request (CAR)

A request issued when a deviation or failure to meet a requirement is identified. A CAR shall be addressed and resolved before a positive validation or verification conclusion can be issued.

Force majeure or unforeseen circumstances

According to the law *"force majeure or fortuitous case is the unforeseen event that cannot be resisted, such as a shipwreck, an earthquake, the capture of enemies, and orders of authority exercised by a public official."*

Forward Action Request (FAR)

A recommendation made when a non-material issue is identified that may affect future compliance. FARs shall be addressed in subsequent verifications.

GHG Statement

A written representation provided by the project holder regarding GHG emission reductions or removals during a specific reporting period, which is subject to validation or verification.

Intended User

Intended User: An individual or organization identified as relying on GHG-related information to make decisions. This includes the project holder, credit buyers, regulators, and other authorized stakeholders.

Insurance level

It is the level of detail that the Conformity Assessment Body (CAB) uses to determine whether there are errors, omissions, underestimate, overestimates, or misinterpretations in the validation or verification process.

Note 1. The assurance level is used to determine the level of detail that the validator or verifier designs in its validation or verification plan to determine if there are errors, omissions, or misinterpretations.

Note 2. There are two levels of assurance (reasonable or limited) that produce differently worded validation or verification statements.

Material Discrepancy

Individual error or aggregation of errors, omissions, and misrepresentations in the GHG assertion. They could affect the intended users' decisions.

Materiality

The concept that errors, omissions, or misrepresentations, individually or in aggregate, could affect the intended user's decisions. The materiality threshold is established by the Program or determined by the CAB in accordance with the assurance level.

Non-conformity (NC)

The failure to meet one or more specified requirements under the BIOCARBON PROGRAM, relevant methodologies, ISO standards, or this Manual.

Relative importance of errors

A concept that individual or cumulative errors, omissions, and distortions could affect the GHG declaration and influence the intended users' decisions.

Note 1. The concept of "relative importance of errors" is used when designing validation or verification and sampling plans. This concept determines the type of key processes used to minimize the risk that a material discrepancy is not detected. The validator or verifier uses this concept as a risk detection tool.

Note 2. The concept of "materiality of errors" is used to identify information that, if omitted or misrepresented, would misrepresent a GHG claim to the intended users, thereby influencing their conclusions. The acceptable materiality of errors is determined by the validator, verifier, or GHG Program, based on the agreed level of assurance.

Responsible party

The entity (usually the project holder) responsible for the development of the GHG statement and submission of supporting information for validation or verification.

Note. The responsible party can be either individuals or representatives of an organization or project, and it can be the party who engages the validator or verifier. The validator or verifier may be engaged by the client or other parties, such as the GHG program administrator.

Sampling Plan

A risk-based strategy defined by the CAB to select data, documents, and sites for review, ensuring that the assurance level and materiality thresholds are met.

Sector

A technical area that shares common attributes and similar GHG sources, sinks, and pools.

Sectoral Scope

A technical domain (e.g., AFOLU, energy, waste, transportation) under which the CAB and its personnel shall demonstrate competence to perform validation and verification activities.

Specified requirement

Established need or expectation. The specified requirements may be set out in normative documents, such as regulations, standards, and technical specifications.

Statement on greenhouse gases

Statement or assertion of fact made by the responsible party.

Note 1. The GHG statement can be submitted at a specific time, or it can cover a period.

Note 2. The GHG statement, provided by the responsible party, should be clearly identifiable and capable of being consistently assessed or measured against appropriate criteria by a validator or verifier.

Note 3. The GHG statement may be provided as a GHG Report or a GHG project plan.

Uncertainty

It is the parameter associated with the quantification that characterizes the dispersion of values reasonably attributed to the quantified quantity.

Note: Uncertainty information generally specifies quantitative estimates of the likely dispersion of values and a qualitative description of the likely causes of the dispersion.

Validation

It is a systematic, independent, and documented process for evaluating a greenhouse gas assertion in a GHG project plan against agreed validation criteria.

Process for evaluating the reasonableness of the assumptions, limitations, and methods that support a statement about the outcome of future activities (ISO14064-2:2019(en)).

Note 1. In some cases, such as first-party validations, independence can be demonstrated by not responsible for developing GHG data and information.

Validation body

A body that performs validations of GHG declarations under ISO 14064-3 and ISO 14065.

Validation criteria; verification criteria

Policy, procedure, or requirement used as a reference against which evidence is compared.

Note: Validation or verification criteria can be set by governments, GHG programs, voluntary reporting initiatives, standards, or good practice guides.

Validation or Verification Statement

A formal written conclusion issued by the CAB, stating whether the validation or verification has been conducted in accordance with the applicable criteria and confirming the findings.

Formal written statement addressed to the intended user, following validation of a GHG project plan, which guarantees what is stated in the responsible party's GHG statement.

Validation team

One or more validators conducting a validation, supported if needed by technical experts.

Validator

Competent and independent person(s) responsible for doing the validation and reporting its results.

Verification

It is the systematic, independent, and documented process for evaluating a GHG declaration against agreed verification criteria.

Process for evaluating a statement of historical data and information to determine if the statement is materially correct and conforms to criteria.

Verification body

Body performing verification of GHG declarations under ISO 14064-3 and ISO 14065.

Verification Period

The specific timeframe during which GHG emission reductions or removals occurred and are subject to verification.

Verification team

One or more verifiers conducting a verification, supported if needed by technical experts.

Verifier

Competent and independent person(s) responsible for verification and reporting on the verification process.

Note 1. The verifiers' competence areas include the GHG Program, technical audit, data and information audit, and project-specific requirements.

7 General requirements of the BIOCARBON PROGRAM

The BIOCARBON GHG Program shall only issue Verified Carbon Credits (VCCs) for GHG emission reductions or removals that have been validated and verified by an independent Conformity Assessment Body (CAB) approved under the Program.

CABs shall conduct their activities in accordance with this Manual, the BCR Standard, relevant ISO standards, and all applicable methodological and procedural documents.

The following general requirements apply:

- (a) GHG projects should be subject to validation and verification processes by an independent third party. These processes ensure that they employ quantification methodologies for GHG emissions reductions or removals that are verifiable within the framework of ISO 14064-3;

- (b) The validation and verification processes shall be carried out by a GHG Conformity Assessment Body (CAB), which complies with the requirements described in the legislation and others defined by the BCR STANDARD;
- (c) The CAB shall issue a validation statement indicating that the identification of the baseline, the use of data and parameters for the estimation of the mitigation outcome, the GHG emission reductions or removals and the monitoring plan were determined applying the selected methodology;
- (d) The CAB shall issue a verification statement, indicating that the GHG emission reductions or removals were generated following the guidance defined in ISO 14064-2 and the results obtained from verification under ISO 14064-3 or those that adjust and update it.

In the framework of validations and verifications, CABs auditor shall comply with the following:

- (a) examine the GHG data and information to develop evidence to evaluate the project's GHG statement. This review should be based on a sampling plan by selecting data and information that provide a reasonable assurance level and ensure compliance with materiality requirements;
- (b) when assessing the material discrepancy, consider the principles of the standards (ISO or those applicable) or the BIOCARBON Program;
- (c) to have standardized procedures to assess the accuracy, relevance, completeness, consistency, and transparency of information provided by GHG project holders and other GHG projects;
- (d) to confirm whether or not the GHG project meets the validation or verification criteria defined by BIOCARBON and those applicable to it.

7.1 Validation and verification scope

Validation and verification shall be conducted for all GHG projects registered under the Program, including:

- (a) All project types and sectors approved under the BCR Standard;
- (b) Grouped projects and activities added post-registration;
- (c) Renewals of quantification periods;

- (d) Verification of emission reductions or removals over each defined monitoring period;
- (e) Validation and verification activities shall assess the full scope of applicable requirements, including:
- (f) Application of an approved methodology and eligibility under sectoral scope;
- (g) Additionality and baseline scenario;
- (h) Quantification approach and level of conservativeness;
- (i) Permanence and leakage risks;
- (j) Monitoring plan and emission/removal estimates;
- (k) Legal ownership and carbon rights;
- (l) Sustainable Development Safeguards and stakeholder engagement;
- (m) Alignment with the host country's NDC and potential need for Corresponding Adjustments.

7.2 Independence and impartiality

CABs shall operate independently of project developers and maintain impartiality throughout the validation and verification process. CABs shall:

- (a) Avoid any actual or perceived conflict of interest;
- (b) Not provide consultancy services to the projects they audit;
- (c) Implement a documented impartiality management policy, consistent with ISO 17029 and ISO 14065;
- (d) Maintain records demonstrating their structural and functional independence;
- (e) Comply with the BioCarbon Ethics and Transparency Program, including all relevant policies on anti-corruption, whistleblower protection, and independence of judgment;
- (f) Require all validation or verification team members, reviewers, and decision-makers involved in the assessment to submit a signed Conflict of Interest (COI) Declaration prior to each engagement, confirming the absence of actual, potential, or perceived conflicts;

- (g) Ensure that no member of the audit team has participated in the design, development, financing, promotion, or commercialization of the project under assessment, including the sale or marketing of associated Verified Carbon Credits (VCCs).

Failure to comply with these requirements shall result in the rejection of the validation or verification report and may trigger additional investigation or disciplinary action in accordance with BioCarbon's oversight procedures.

7.3 Assurance, materiality and conservativeness

CABs shall:

Apply the assurance level and materiality threshold as defined by BIOCARBON or in accordance with ISO 14064-3;

- (a) Use a conservative approach in case of uncertainty;
- (b) Apply sound professional judgment, supported by documented procedures;
- (c) Design sampling plans proportionate to project risks and complexity.

7.4 Documentation and traceability

CABs shall ensure that:

- (a) All validation and verification activities are fully documented and traceable;
- (b) Reports clearly state the conclusions reached, the criteria applied, and any limitations or exclusions;
- (c) The validation/verification statement follows BIOCARBON's required format and references the specific monitoring period and associated project documents.

7.5 Reporting obligations to BIOCARBON

CABs shall submit the following:

- (a) Validation or verification report and corresponding statement;
- (b) Any corrective action requests (CARs), clarification requests (CLs), or forward action requests (FARs) raised and resolved;
- (c) The sampling plan used and justification of assurance level;

- (d) Supporting documentation or working papers upon request by BIOCARBON.

BIOCARBON may reject any validation or verification report if it is determined that the CAB has not fulfilled the requirements of this Manual, or if the report lacks transparency, traceability, or methodological rigor.

8 Conformity Assessment Bodies (CABs)¹

The GHG Conformity Assessment Bodies shall be accredited according to the applicable regulations and the provisions of the BCR STANDARD.

8.1 General requirements

Conformity Assessment Bodies (CABs) shall be responsible for performing validation and verification of GHG projects under the BIOCARBON GHG Program. To be eligible, CABs shall:

- (a) Be a legally established entity, or a defined part of such an entity, capable of assuming full legal responsibility for all validation and verification activities;
- (b) Be responsible for validation and verification statements and retain authority over its decisions concerning validation and verification
- (c) Be responsible for the impartiality of its validation and verification activities and does not allow commercial, financial, or other pressures to compromise the guarantee of impartiality.
- (d) Operate independently and impartially, with structures in place to prevent conflicts of interest;
- (e) Maintain professional liability insurance of at least USD 5 million, covering all risks arising from their activities;
- (f) Be accredited in accordance with ISO 14065 and ISO 17029, by an accreditation body that is a signatory to the IAF Multilateral Recognition Arrangement (MLA);

¹ Some of the requirements set out in this part of the document are met by the accreditation of the CAB by the accrediting bodies (ANAB, ANSI, ONAC, EMAS, etc.).

- (g) Demonstrate sector-specific competence, including expertise in the type of activities, technologies, and geographic context relevant to the project under review;
- (h) Have documented procedures for managing: assignment of personnel, Internal quality control, risk management and due diligence, complaints and appeals, confidentiality and data protection, ethics and anti-corruption policies.

CABs shall be subject to regular performance reviews and audits by BIOCARBON, as set forth in the CAB Performance Evaluation Manual.

Conformity Assessment Bodies, which carry out the validation and verification of GHG projects, should also demonstrate the following:

- (a) The scope of their accreditation includes the GHG mitigation activities subject to the validation and verification process,
- (b) Has a sufficient number of professionals, who demonstrate the necessary ethical conduct to perform all the functions required for validation and verification,
- (c) The auditors are experienced in the sector project type for which they are assigned and have the appropriate competence,
- (d) Ensures the necessary expertise and practice on environmental issues relevant to the verification of GHG projects and ensures quality in conformity assessment,
- (e) Has knowledge of the technical aspects of GHG projects and methodologies for quantification and monitoring of GHG emission reductions and removals, including competence for the assessment of baselines, as well as mitigation outcomes,

Furthermore, CABs shall work in an independent, reliable, non-discriminatory, and transparent manner, respecting the applicable legislation and complying, in particular, with the following requirements:

- (a) Have a documented structure that protects its integrity, with provisions to ensure the impartiality of its operations,
- (b) Have appropriate arrangements to protect the confidentiality of information obtained from GHG project operators,

- (c) Demonstrate that they have no actual or potential conflict of interest with the GHG project operators for whose validation or verification they have been engaged,
- (d) Make available to BIOCARBON, upon request, information obtained from GHG project holders. Information classified as confidential shall not be disclosed without the written consent of the provider unless required by national legislation,
- (e) As defined in the BCR STANDARD, information used to determine additionality, baseline scenario and mitigation outcomes shall not be considered confidential.

CABs are responsible for conducting an objective assessment and issuing a validation or verification statement concerning the information submitted to them by the project holder and the other criteria defined by BIOCARBON.

The scope of validation or verification should include the following:

- (a) the project boundaries;
- (b) an assessment to confirm that project areas are not included in, or overlap with, the geographic boundaries of other projects. This assessment should include cross-checking national registries and/or data available from registries and other governmental/national registry systems²;
- (c) the physical infrastructure, activities, technologies, and processes of the GHG project;
- (d) an Assessment of the NDC of the country where the Project is under development to determine whether the Project's activities are covered by the NDC;
- (e) the adequate use of an appropriate methodology;
- (f) the baseline scenario and additionality;
- (g) the GEI, the sources and reservoirs;
- (h) the project participants, ownership and carbon rights;
- (i) Free, Prior, and Informed Consent (FPIC), if applicable;

² Performing a comprehensive assessment involves verifying the reliability of data sources and ensuring that they are up-to-date. This can be achieved by comparing information from different registries and cross-referencing it with other reliable sources, such as official government reports or publications. This allows for a comprehensive and reliable assessment that provides a more accurate understanding of the situation.

- (j) the risk assessment and the project permanence;
- (k) leakages and the project mitigation result;
- (l) the areas or instances of the project, where is a grouped project;
- (m) conformity of the project with the requirements for grouped projects under the BCR STANDARD;
- (n) the project length and the quantification periods;
- (o) the renewal(s) of the quantification periods;
- (p) the reassessment of the baseline scenario, if applicable;
- (q) the criteria and indicators related to co-benefits, if applicable;
- (r) the REDD+ safeguards, if applicable;
- (s) the sustainable development safeguards;
- (t) the contribution of the project to sustainable development objectives;
- (u) the monitoring plan and/or the monitoring report;
- (v) the assessment of uncertainty and conservative approach;
- (w) the stakeholder engagement and consultation;
- (x) the compliance with Laws, Statutes and Other Regulatory Frameworks.

8.2 Validation and verification team

The CAB shall assign a qualified team for each validation or verification activity. The team shall operate under a team leader and may include sectoral specialists, technical experts, and auditors, as necessary.

8.2.1 Team competence

Requirements for environmental information validation and verification bodies are established in ISO 14065. ISO 14065 requires that validation and verification bodies establish and maintain a procedure to manage the competence of its personnel undertaking the various validation or verification activities within the team and independent reviewer appointed for the engagement.

CABs shall ensure that assigned personnel:

- (a) Have demonstrated experience in the project type and sector, consistent with the project's scope;
- (b) Are technically competent in baseline determination, GHG quantification, leakage assessment, additionality testing, permanence, and uncertainty management;
- (c) Understand and apply BIOCARBON's methodologies and tools, including the Baseline & Additionality Tool, ADC Tool, SDSs Tool, and Permanence Tool;
- (d) Comply with the latest versions of ISO 14064-3, ISO 14065, and BIOCARBON program documents;
- (e) Have received periodic training and professionalization under a documented program managed by the CAB.

A validation and verification team should have the required competence to carry out validation or verification activities³.

A validation or verification team shall have:

- (a) knowledge of the GHG Program, including eligibility requirements, applicable laws and validation, verification guidelines, and GHG emissions or removal's scope to be reported. Also, knowledge of project types including sectors and technological areas, applicable methodologies and emission reductions or removals,
- (b) technical knowledge of GHGs, global warming potentials, activity data, and emission factors, application of material error and discrepancy, as well as GHG sources and reservoirs in the relevant sector and techniques and procedures to ensure data quality,
- (c) knowledge of data and information auditing including data and information audit methodologies, risk assessment methodologies, data, and information sampling techniques and GHG data and information control systems.

³ ISO 14065 establishes the competence required for the validation and verification team in section 6.3, and the process of the competence management in sections 6.1 and 6.2. In addition, ISO 14066:2011 specifies the competence requirements for team of validation and verification of GHG.

8.2.2 Skills

A validation or verification team should have the necessary skills to carry out validation or verification activities. Team members shall demonstrate:

- (a) Capacity to assess quantitative and qualitative data, conduct field visits, and identify risks;
- (b) Knowledge of national and international legal frameworks, including climate, land use, and environmental laws;
- (c) Familiarity with host country NDCs and the implications for corresponding adjustments where applicable;
- (d) Understanding of safeguards, stakeholder engagement, and benefit-sharing mechanisms;
- (e) Proficiency in preparing clear, complete, and technically justified reports.

8.2.3 Sectoral competence

The CAB shall assign personnel with sectoral competence for:

- (a) AFOLU (ARR, REDD+, and others), including biomass modeling, forest dynamics, and land use governance;
- (b) Energy, transportation, and waste sectors, including relevant technologies and emission sources;
- (c) Cross-sectoral issues such as double counting risk, jurisdictional overlaps, and carbon rights;
- (d) Geographic expertise relevant to the project's host country, including institutional, ecological, and socio-cultural context.

The CAB shall submit information related to professional training and work experience relevant to the competence to demonstrate the validation or verification team's competence and knowledge.

8.2.4 Compliance with BIOCARBON's Anti-Corruption Policy and Procedures and AML/CFT/CPF Policy and Procedures

8.2.4.1 *Conflicts of interest*

The CAB shall certify that there is no apparent conflict that limits the provision of validation and/or verification services. Therefore, auditors can act objectively and independently since there is no apparent circumstance that limits the provision of services, in accordance with the laws that govern the purpose of said services. However, if in the course of the activities, BCR determines that there is any new fact that may constitute a limitation to the provision of validation and/or verification services, it will immediately communicate the reasons and circumstances of this to CAB.

8.2.4.2 *Confidentiality*

CAB shall expressly compromise, both during the term of the agreement with BCR and after its expiration, not to disclose, transmit or reveal to third parties any Company information to which he has access as a result of the performance of his work activity, nor to use such information in their own interest or of a third party's.

The prohibition established above extends to the reproduction on any medium of the GHG projects or company's information to which it has access regarding clients, organizational processes and systems, computer programs or any other type of internal information, unless such information is strictly necessary for the development of the content inherent to their job position and is carried out within the scope of the validation and verification processes.

The violation of this commitment will be considered as a justified cause for the termination of the agreement between BCR and CAB.

In the event of breach of the commitment assumed and regardless of the termination of the agreement, BCR reserves the right to claim compensation for damages that might be caused as a result of the breach of the duty of confidentiality and professional secrecy agreed in the present clause.

8.2.4.3 *Compliance of the Code of Ethics and regulations against bribery and corruption*

The CAB is obliged to comply with all the provisions of the BCR's Code of Ethics, on which the conduct of auditors is forged in decision-making and in the development of validation and verifications processes, as well as with all anti-corruption regulations, defense of competition, prevention of asset laundering and terrorism financing, and other criminal or other laws, guidelines and regulations applicable.

8.2.4.4 *Money laundering and terrorism financing*

The CAB is required to comply with BIOCARBON's AML/CFT/CPF Policy and Procedures. Accordingly, it expressly agrees to avoid any relationship with individuals and/or entities involved in money laundering or terrorist financing. The CAB shall conduct its activities in full compliance with all applicable laws and regulations on Money Laundering and Terrorism Financing in the countries where it operates, ensuring that all transactions with customers, suppliers, and partners are related to legitimate business activities and that all funds originate from lawful sources.

In compliance, all validation/verification team members shall:

- (a) Sign a Declaration of No Conflict of Interest before undertaking each engagement;
- (b) Comply with BIOCARBON's Anti-Corruption and AML/CFT Policies;
- (c) Be subject to BIOCARBON's Whistleblower and Ethics Oversight Mechanisms, including random integrity checks and reporting obligations;
- (d) Maintain strict confidentiality regarding project data and stakeholder communications, except where disclosure is legally required or programmatically mandated.

9 Validation and verification requirements

9.1 Risk-based approach

Validation and verification shall follow a structured, risk-based, and transparent process aligned with internationally recognized assurance standards. The procedures in this section apply to all CABs and all eligible GHG projects under the BIOCARBON GHG Program.

The CAB shall apply a risk-based approach to the design and execution of validation and verification activities. This approach shall consider:

- (a) The complexity and scale of the GHG project;
- (b) The reliability and quality of data sources and monitoring systems;
- (c) The degree of uncertainty in key parameters;
- (d) The risk of material misstatements or omissions;

- (e) The risk of over-crediting or double counting;
- (f) The track record of the project and responsible party.
- (g) The level of review effort, sampling intensity, and documentation requirements shall be proportionate to the identified risks and aligned with the selected assurance level.

9.1.1 Assessment of double counting risks

As part of the risk-based approach, the CAB shall assess and document the risk of double counting of emission reductions or removals. This includes the risks of:

- (a) Double registration: when a project, or any of its areas (particularly in AFOLU projects), is registered more than once under the BioCarbon Standard or in other GHG programs;
- (b) Double issuance: when more than one unit is issued for the same mitigation outcome;
- (c) Double use: when the same mitigation outcome is claimed toward more than one purpose (e.g., offsetting, NDC compliance, or CORSIA claims).

To address these risks, the CAB shall:

- (a) Verify that the project is not registered under another standard, program, or registry;
- (b) Cross-check the project's geospatial boundaries, name, and identifying information against the BioCarbon registry to ensure the project (or any of its areas) is not already registered or pending registration;
- (c) Review available public and governmental registries, jurisdictional initiatives, or national systems (where accessible) to confirm that the same areas or mitigation outcomes are not being claimed elsewhere;
- (d) Evaluate the project's ownership and carbon rights documentation to confirm that no overlapping or competing claims exist;
- (e) Review the application and outcomes of the BioCarbon Avoiding Double Counting Tool (ADC Tool), ensuring that it is complete, justified, and consistent with the project documentation.

The findings of this assessment shall be clearly documented in the Validation or Verification Report. Where unresolved risks or indications of double counting exist, the CAB shall issue a Corrective Action Request (CAR) and shall not issue a positive validation or verification statement until the issue is resolved.

9.1.2 Assessment of reversals risks

For all project types, the CAB shall assess whether the project has appropriately identified, monitored, and mitigated reversal risks throughout the crediting and permanence periods. This assessment shall include:

- (a) Confirmation that the project's reversal risk assessment has been conducted in accordance with the BioCarbon Permanence and Risk Management Tool, including all applicable modules and timeframes;
- (b) Evaluation of the adequacy of the project's proposed mitigation measures to reduce the likelihood of reversals, based on site-specific drivers (e.g., fire, pests, illegal harvesting, encroachment);
- (c) Review of the project's monitoring system to detect actual occurrences of reversals, including geospatial monitoring, field surveys, and early-warning systems, where applicable;
- (d) Verification that any identified reversals (if applicable) have been quantified, reported, and deducted from the project's GHG assertion in accordance with the BioCarbon Standard and relevant guidance;
- (e) Assessment of whether any updates to the reversal risk rating or reserve contribution are warranted due to changes in project conditions, threats, or mitigation capacity.

The CAB shall document all findings related to reversal risk monitoring and response in the Validation or Verification Report, including the rationale for accepting or rejecting the project holder's assessment. A positive verification statement shall not be issued if the monitoring, quantification, or response to reversal risk is found to be incomplete, inconsistent, or non-compliant with BioCarbon requirements.

9.1.3 Assessment of leakage risk

The CAB shall assess whether the project has adequately identified, estimated, and mitigated leakage risks, in accordance with the applied methodology and BioCarbon Standard requirements. This assessment shall include:

- (a) Review of the project's baseline and activity data to identify potential sources of displacement of emissions beyond the project boundary;
- (b) Evaluation of the project's leakage assessment methodology, including the use of leakage belts, activity-shifting models, or jurisdictional leakage analysis, as applicable;
- (c) Assessment of the consistency and appropriateness of leakage monitoring plans, data sources, and any mitigation measures implemented (e.g., alternative livelihoods, supply substitutions);
- (d) Verification that leakage emissions have been conservatively quantified and deducted from the net emission reductions or removals claimed by the project;
- (e) Evaluation of whether the project's context (e.g., AFOLU activity, market conditions, policy environment) warrants adjustments to the original leakage assumptions or models.

All leakage-related findings shall be clearly documented in the Validation or Verification Report. Where leakage is found to be significant and inadequately addressed, the CAB shall issue a Corrective Action Request (CAR) and shall not approve the final GHG assertion until compliance is demonstrated.

9.2 Conservative approach

In case of uncertainty, the CAB shall apply a conservative approach in line with ISO 14064-3 and BIOCARBON methodologies. When multiple valid assumptions or estimates are possible, the option resulting in the lowest credible quantity of emission reductions or removals shall be selected.

In all cases, the assessment of uncertainty shall be carried out in accordance with the BioCarbon Uncertainty Assessment Tool. The CAB shall verify that the project holder has applied the tool correctly, and that uncertainty levels have been quantified and transparently incorporated into emission reduction or removal estimates.

All assumptions, data sources, estimation methods, and conservative adjustments shall be clearly justified, supported by evidence, and documented in the Validation or Verification Report.

9.3 Levels of assurance and materiality

The level of assurance refers to the degree of confidence the Conformity Assessment Body (CAB) provides regarding the validity of the information assessed during validation or verification. It determines the scope and depth of evidence-gathering activities. Under the BioCarbon Standard, a reasonable level of assurance is required for all validation and verification activities, in accordance with ISO 14064-3.

Materiality refers to the threshold below which errors, omissions, or misstatements are not considered to affect the overall credibility and reliability of the reported emission reductions or removals. CABs shall apply a materiality threshold of 5%, unless otherwise specified in the applicable methodology. The CAB shall evaluate whether any individual or cumulative discrepancies exceed this threshold and require correction.

CABs shall plan and execute their validation or verification procedures accordingly, using professional judgment to determine the nature, timing, and extent of audit activities needed to achieve the required assurance level while ensuring that material errors are identified and addressed.

The BIOCARBON Program recognizes two levels of assurance:

- (a) Reasonable assurance: High degree of confidence; requires detailed, comprehensive procedures and sampling;
- (b) Limited assurance: Moderate degree of confidence; suitable for smaller or lower-risk projects.

In accordance with the above, the OEC is required to:

- (a) Explain the assessment of GHG data and information to improve the evidence supporting the assessment of the project's mitigation outcome, based on a sampling plan that selects data and information that provides reasonable assurance and ensures compliance with materiality requirements,
- (b) Determine the relative importance (materiality), considering the objectives, assurance level, criteria and scope of validation/verification,
- (c) Provide a complete description of the assessment of the individual or the aggregation of errors or omissions that would significantly misrepresent a GHG claim and could affect the conclusions about GHG emission reductions/removals,

- (d) Provide the level of assurance (degree of confidence in the mitigation outcome) achieved, and the evidence collected that was used in the validation/verification process.

CABs shall define and apply materiality thresholds consistent with the selected assurance level. Materiality shall reflect the relative importance of potential errors or omissions in influencing the intended user's decision. Any discrepancy that exceeds the established threshold shall be treated as a non-conformity.

9.4 Validation and Verification Planning

The CAB shall prepare a detailed plan for each validation or verification, including:

- (a) Definition of scope, objectives, and timeline;
- (b) Identification of key risks and assumptions;
- (c) Selection of data sources and sampling approach;
- (d) Description of applicable methodologies and program requirements;
- (e) Identification of relevant stakeholders for consultation;
- (f) Justification of the selected assurance level and materiality threshold;
- (g) Inclusion of site visits, if applicable.

The plan shall be reviewed internally by the CAB and provided to BIOCARBON upon request.

9.5 Sampling Plan

CABs shall design and implement a sampling plan appropriate to the project's risk profile, complexity, and data volume. The plan shall include:

- (a) Sampling methodology and rationale;
- (b) Number and type of data points, plots or sites to be reviewed;
- (c) Geographic and temporal distribution of samples;
- (d) Justification of representativeness and statistical sufficiency;
- (e) Documentation of all selected samples and results.

In accordance with that, the CAB shall develop and document a comprehensive sampling plan, in accordance with the BCR Standard and ISO 14064-3, considering the scope, objectives, level of assurance, the quality and type of evidence (qualitative and quantitative) required to achieve the required level of assurance, the methodologies for determining representative samples, and the risks of potential errors, omissions, or misinterpretations.

The sampling plan shall include the following:

- (a) Clearly define the required level of assurance (reasonable or limited), the scope of the validation or verification and the corresponding materiality thresholds applicable to the type of project.
- (b) Describe the sampling approach selected by the audit team (e.g., random, stratified, systematic), and provide a justification for its selection based on the characteristics of the population, type of data, and validation criteria. The method shall include procedures for estimating data variability and determining the minimum sample size needed to achieve the required confidence level and precision requirements.
- (c) Specify the type, quality, and quantity of evidence required, both qualitative and quantitative to support the assessment conclusion. The evidence shall be sufficient and appropriate to reduce the risk of material errors, omissions, or misinterpretations to an acceptably low level.
- (d) Identify potential sources of error, omission, or misrepresentation, including risks related to materiality, data quality, or assumptions. The sampling strategy shall be adapted as necessary based on these identified risks and refined through initial validation/verification activities.

For AFOLU projects, the sampling plan shall include a procedure to determine the number and spatial distribution of measurement plots. This includes using pilot measurements or existing forest inventories to validate the proposed sampling density and design. The audit team shall ensure that the selected approach adequately represents project heterogeneity and minimizes bias.

All sampling decisions, justifications, and any changes made throughout the assessment shall be clearly documented to ensure transparency and traceability. This documentation is critical to support replicability, stakeholder confidence, precision levels and quality assurance.

The sampling plan shall serve as a key input to the development of the overall validation or verification plan. It shall be referenced and reflected in the evidence-gathering and testing procedures implemented by the audit team.

Sampling shall enable the CAB to reach a conclusion with the required level of confidence while ensuring completeness and traceability.

9.6 Site Visits

At least one on-site audit shall be conducted for each project prior to registration. Site visits shall be used to:

- (a) Verify the existence of project infrastructure and activities;
- (b) Cross-check data with field measurements and observations;
- (c) Interview relevant personnel and stakeholders;
- (d) Assess compliance with safeguards, FPIC (if applicable), and land tenure requirements;
- (e) Identify any discrepancies, omissions, or non-conformities.

On-site visits are mandatory both for the initial validation and for subsequent verifications, unless the BioCarbon Program issues a formal and documented instruction authorizing a hybrid or virtual modality under exceptional circumstances (e.g., access restrictions, health emergencies, or natural disasters).

Under no circumstances may the on-site visit be unilaterally substituted at the discretion of the CAB..

9.7 Documentation and Reporting

All validation and verification activities shall be fully documented. The validation or verification report shall include, at minimum:

- (a) Description of the procedures, criteria, and standards/tools applied during the assessment, including version numbers and relevant guidance documents;
- (b) Identification of the personnel who conducted the validation or verification, their roles, and confirmation of their independence and competence;
- (c) Identification of risks (e.g., project performance, data integrity, leakage, permanence, environmental and social risks) and how they were addressed or mitigated;
- (d) Evaluation of materiality and uncertainty, including how these factors affect the reported mitigation outcomes;

- (e) Findings related to:
 - (i) Baseline scenario and its validity;
 - (ii) Additionality demonstration;
 - (iii) Complete and proper application of the approved methodology, including assessment of applicability conditions, emission sources and sinks, calculation procedures, and assumptions and parameters used;
 - (iv) Evaluation of the Monitoring Plan, including its completeness, appropriateness, and consistency with the applied methodology and the BCR Standard requirements;
 - (iv) Implementation of environmental and social safeguards, including:
 - Sustainable Development safeguards (aligned with BioCarbon's SDS Tool),
 - SDG contribution and assessment (if applicable),
 - REDD+ safeguards (when applicable), including Cancun and/or national safeguards frameworks;
- (f) Assessment of the project's eligibility under any Special Category, including justification, applicable criteria, and supporting evidence (if the project holder has requested such classification);
- (g) Summary of the stakeholder consultation process, including treatment of comments (if applicable);
- (h) List of Clarification Requests (CLs), Corrective Action Requests (CARs), and Forward Action Requests (FARs), including how each was addressed by the project holder;
- (i) Verification of legal ownership and project boundary consistency, including registry cross-checks to avoid double registration;
- (j) Confirmation of data quality control and assurance procedures used by the project holder;
- (k) Final verification conclusion, level of assurance provided, and any qualifications or limitations identified by the Conformity Assessment Body (CAB);

All supporting documentation (working papers, checklists, correspondence) shall be retained by the CAB for a minimum of 10 (10) years and made available to BIOCARBON upon request.

10 Management of findings and validation/verification statements

10.1 Clarification, Corrective, and Forward Action Requests

CABs shall apply a consistent and structured classification system to all findings that arise during validation or verification, in accordance with the BIOCARBON GHG Program definitions:

The Conformity Assessment Body shall consider the following:

A clarification request (CL) is issued when the information is insufficient, unclear or not sufficiently transparent to determine whether a requirement is met.

A Corrective Action Request (CAR) is issued when: (a) errors have been made in assumptions, application of methodology, or project documentation that directly affect mitigation outcome; or (b) requirements considered relevant to the validation/verification of a project have not been met.

A Future Action Request (FAR) may be raised in the context of validation if the OEC considers that some issues related to project implementation need to be reviewed during the initial verification.

A Forward Action Request (FAR) in the context of verification is issued for actions which do not result in material impact on the estimation of emission reductions and applied for situations where the actual project monitoring and reporting requires attention and /or adjustment for the next verification period.

10.1.1 Clarification Request (CL)

A CL shall be issued when the information provided in the Project Documentation, Monitoring Report, or supporting evidence is insufficient, ambiguous, or unclear to determine compliance with the applicable requirements.

- (a) CLs do not constitute a non-conformity but shall be addressed by the project holder in writing before the validation or verification can proceed.

- (b) The CAB shall document the reason for the CL and the resolution provided by the project holder.

10.1.2 Corrective Action Request (CAR)

A CAR shall be issued when a deviation from applicable requirements is identified that could materially affect the validation or verification outcome.

CARs shall be categorized as either:

- (a) Minor: if the issue is correctable without re-audit and does not significantly impact the integrity of the reported outcomes;
- (b) Major: if the issue requires substantial corrective actions, a potential re-audit, or a full reassessment.

All CARs shall be resolved and verified by the CAB before a positive statement can be issued. Unresolved CARs shall result in a suspension or rejection of the validation/verification process.

10.1.3 Forward Action Request (FAR)

A FAR shall be issued for observations that:

- (a) Do not materially affect the current validation or verification outcome;
- (b) May require monitoring or correction in future periods;
- (c) Relate to emerging risks, unclear assumptions, or procedural weaknesses.

FARs shall be documented in the final report and reviewed in subsequent verifications.

10.2 Tracking and documentation of findings

All CLs, CARs, and FARs shall be:

- (a) Recorded in a formal log maintained by the CAB;
- (b) Clearly referenced in the validation or verification report;
- (c) Accompanied by the project holder's response and the CAB's final disposition (accepted, rejected, or modified);
- (d) Retained in the CAB's working files and made available to BIOCARBON upon request.

BIOCARBON reserves the right to request clarifications or issue additional findings if inconsistencies or omissions are identified during internal review of submitted reports.

10.3 Validation or verification statement

10.3 Validation or Verification Statement

After all findings have been resolved to the satisfaction of the CAB, the validation or verification statement shall be issued. The statement shall:

- (a) Be addressed to the intended user (BIOCARBON and other relevant parties);
- (b) Be signed by the team leader or authorized representative of the CAB;
- (c) Clearly indicate the:
- (d) Scope and type of engagement (validation or verification);
- (e) Assurance level applied (reasonable or limited);
- (f) Materiality threshold used;
- (g) Monitoring period covered (for verification);
- (h) Final conclusion (positive, qualified, or negative);
- (i) Any unresolved issues or limitations;
- (j) Reference the applicable version of:
- (k) The BCR Standard,
- (l) The approved methodology,
- (m) Relevant tools (e.g., ADC, Baseline Tool, Permanence Tool, SDSs),
- (n) The Validation and Verification Manual.

The project shall only be eligible for registration or issuance of Verified Carbon Credits (VCCs) once the validation or verification statement has been reviewed and formally accepted by BIOCARBON.

Appeals, Complaints and Dispute Resolution

11 Appeals, complaints and dispute resolution

All Conformity Assessment Bodies (CABs) and project holders shall have access to clear, transparent procedures to raise concerns, submit appeals, or address disputes related to validation or verification outcomes under the BIOCARBON GHG Program.

11.1 Appeals

Project holders may file an appeal if they disagree with a final validation or verification decision issued by a CAB. Appeals shall:

- (a) Be submitted in writing within 30 calendar days following the issuance of the decision;
- (b) Include a detailed justification and any supporting documentation;
- (c) Be reviewed by BIOCARBON or a designated independent technical committee not involved in the original decision.

BIOCARBON shall provide a written response to the appeal within 45 calendar days. If the appeal is accepted, corrective actions may include re-evaluation, reassignment of CAB personnel, or additional technical review.

11.2 Complaints

Any party, including project stakeholders or other interested entities, may submit a complaint concerning:

- (a) The conduct of a CAB;
- (b) The quality, impartiality, or integrity of validation or verification activities;
- (c) Non-compliance with BIOCARBON procedures or ethical standards.

Complaints shall be addressed through BIOCARBON's Ethics and Compliance Channel or the formal Petitions, Complaints, and Claims (PCC) mechanism as defined in the Standard Operating Procedures (SOP). Anonymous submissions are accepted and protected under BIOCARBON's whistleblower policy.

11.3 Dispute resolution

In the case of disputes arising between CABs and project holders, BIOCARBON shall facilitate resolution through:

- (a) Mediation and joint clarification meetings;
- (b) Written review of the technical or procedural disagreements;
- (c) Escalation to an independent panel if required.

The outcome of the dispute resolution process shall be recorded in writing and communicated to all involved parties. Disputes that may affect the integrity or eligibility of a project may result in suspension of the registration process or initiation of a targeted review.

12 Monitoring, updates, and continuous improvement

BIOCARBON shall ensure that the Validation and Verification Manual (VVM) remains consistent with evolving standard updates, scientific knowledge, international best practices, and applicable regulatory requirements.

12.1 Periodic review

This Manual shall be reviewed at least once every five (5) years, or earlier if:

- (a) Substantial changes are introduced in ISO standards applicable to GHG validation and verification;
- (b) New requirements are adopted under international carbon market frameworks, including mechanisms authorized under the Paris Agreement;
- (c) Lessons learned from project evaluations or stakeholder feedback indicate the need for clarification or enhancement.

12.2 Stakeholder feedback

BIOCARBON encourages feedback from project holders, Conformity Assessment Bodies (CABs), accreditation bodies, and other relevant stakeholders. Feedback may be submitted via the BIOCARBON website or Email; or Official stakeholder consultation processes.

All feedback shall be recorded and reviewed during the next formal update cycle. Material feedback may be considered for immediate interim amendments, subject to internal approval.

12.3 Version control and communication

Any updates to this Manual shall be published on the BIOCARBON website. Changes shall be clearly marked in the updated version and summarized in a “Document History” annex.

This version supersedes v2.5 and enters into effect after a 30-day transition period from the publication date.

12.4 Capacity building and technical guidance

BIOCARBON may provide updated technical guidance, training materials, and webinars to support the consistent application of this Manual. CABs are responsible for ensuring their teams are trained on the latest version in use.

Document history

Type of document. Normative

Validation and verification Manual of GHG projects.

Version	Date	Nature of the revision
1.0	April 17, 2020	Initial version
1.1	October 19, 2020	Updated version Starting date
1.2	January 19, 2021	Updated version Section 8.3
1.3	April 5, 2021	Updated version Validation and Verification Bodies (VVOs) changed to Conformity Assessment Bodies (CABs) Liability Insurance section now in section 10.1.3 Clarifications and definitions about other greenhouse gas projects
2.0	February 18, 2022	Updated version Mitigation initiatives and other GHG projects now referred to as GHG projects.
2.1	February 13, 2023	Updated version The first party auditory was eliminated
2.2	October 19, 2023	Updated version Updated Section 9. OEC and consecutive verifications Section 10.1.3 updated. Professional Liability Insurance Minor editorial changes
2.3	January 9, 2024	Updated version Transition period for the use of the updated version

2.4	March 23, 2024	Updated version Section 8.1. General requirements, scope of the validation or verification Section 8.2.1. Team competence Section 9.1. Validation
2.5	June 17, 2024	Updated version Professional indemnity insurance
3.0	June 13, 2025	Full revision of the Validation and Verification Manual to ensure alignment with the BioCarbon Standard v4.0 and all operational procedures under the BioCarbon GHG Program. This version introduces structural improvements, strengthens alignment with ISO 14064-3 and ISO 14065, and integrates full compliance with the Core Carbon Principles (ICVCM), the CORSIA Eligibility Criteria, and Article 6 of the Paris Agreement. Key additions include: (i) risk-based validation and verification procedures, (ii) assurance and materiality protocols, (iii) traceable classification and resolution of findings, (iv) a new section on appeals, complaints and dispute resolution, and (v) provisions for version control and continuous improvement.