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ClassNK

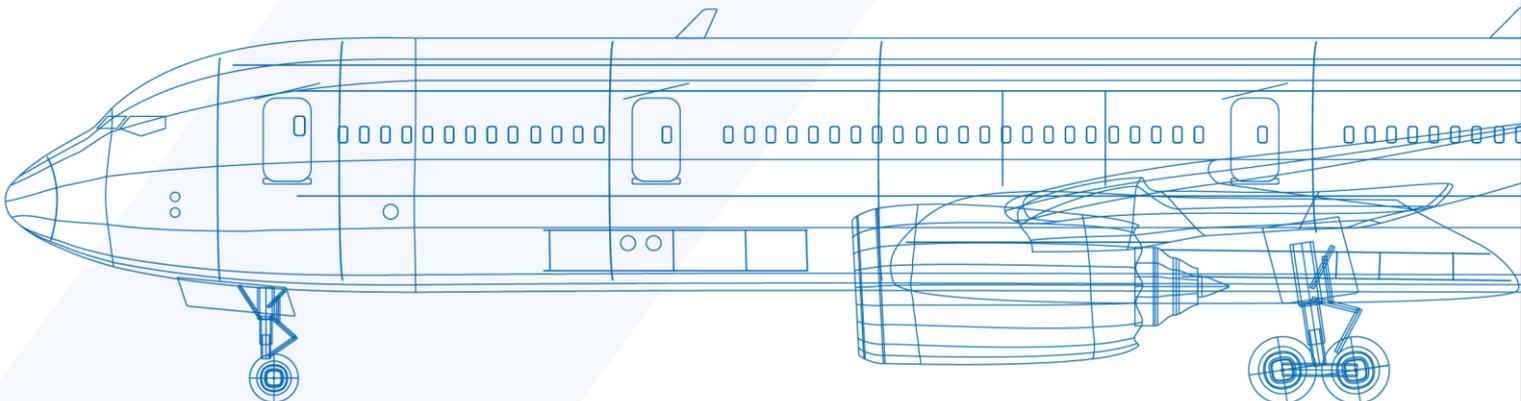
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ClassNK SCS

**Requirements
for Certification
Bodies**

**Certification for
CORSA Eligible Fuels**

April 2024



Revision History

No.	Issue date	Details of revision
0	2024.04.01	Newly issued

In case the requirements in ICAO-CORSIA documents are updated, and the ClassNK SCS manual has not been revised to reflect such updates yet, the updated requirements shall be applied during verification irrespective of the state of revision of the ClassNK SCS manual.

Requirements for Certification Bodies

Foreword

This document is prepared for Annex 16 — Environmental Protection, Volume IV — Carbon Offsetting and Reduction Scheme for International Aviation (CORSA).

The ICAO document is available on the ICAO CORSA website and may only be amended by the Council.

Introduction

This document lays down the requirements for the Certification Bodies (hereinafter referred to as “CB”) to become recognized by ClassNK SCS

Contents

1. Scope	5
2. Normative references	6
3. Terms and definitions	7
4. General requirements	8
4.1 Legal and contractual matters	8
4.2 Management of impartiality.....	8
4.3 Liability and financing	8
4.4 Non-discriminatory conditions.....	8
4.5 Confidentiality.....	8
4.6 Publicly available information	8
5. Structural requirements	9
5.1 Organizational structure and top management.....	9
5.2 Mechanism for safeguarding impartiality	9
6. Resource requirements	10
6.1 CB personnel.....	10
6.2 Resources for evaluation.....	11
7. Process requirements	12
7.1 General.....	12
7.2 Application	14
7.3 Application review.....	14
7.4 Evaluation	14
7.5 Review	16
7.6 Certification decision.....	16
7.7 Certification documentation.....	16
7.8 Directory of certified products	16
7.9 Surveillance	16
7.10 Changes affecting certification.....	16
7.11 Termination, reduction, suspension or withdrawal of certification.....	17
7.12 Records	18
7.13 Complaints and appeals.....	18

8. Management system requirements	19
8.1 Options	19
8.2 General management system documentation (Option A).....	19
8.3 Control of documents (Option A).....	19
8.4 Control of records (Option A)	19
8.5 Management review (Option A).....	19
8.6 Internal audits (Option A)	19
8.7 Corrective actions (Option A).....	19
8.8 Preventive actions (Option A)	19

APPENDIX

- A001 APPENDIX 1. Group auditing requirements
- A002 APPENDIX 2. Application of sustainability criteria

1. Scope

The requirements specified in this document apply to all CB accredited by the Accreditation Body conducting audits for certification services under the scheme of ClassNK SCS according to the requirements of ICAO CORSIA.

2. Normative references

Referenced ISO standards:

- ISO/IEC 17065 Conformity assessment - Requirements for bodies certifying products, processes and services
- ISO 19011 Guidelines for auditing management systems
- ISO 14064-3 Specification with guidance for the validation and verification of greenhouse gas assertions

Note. - The most recent version of the standards applies.

3. Terms and definitions

For the purposes of this document, the terms and definitions given in ISO/IEC 17000 and the following apply.

Accreditation. A third-party attestation related to a certification body conveying formal demonstration of its competence to carry out specific conformity assessment tasks (adapted from ISO 17011).

Accreditation bodies. Authoritative bodies that perform accreditation (ISO 17011).

Assurance system. A system of accreditation, certification, auditing processes and procedures maintained by a Sustainability Certification Scheme.

Auditors. Auditors plan, conduct and complete audits on behalf of the certification body. Responsibilities include designing risk-based audit and evidence-gathering plans, designing sampling procedures, evaluating the adequacy and sufficiency of evidence of compliance, identifying nonconformities, issuing a recommendation for or against certification and preparing an audit report.

Audits. Systematic, independent and documented processes for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled (adapted from ISO 19011:2011).

Certification bodies (CB). Third-party conformity assessment bodies (ISO 17065:2012) making certification decisions and issuing certificates.

Economic operator. Economic operators include feedstock producers, processing facilities, and traders.

Stakeholder. Individual or group that has an interest in any decision or activity of an organization (adapted from ISO 26000).

Sustainability Certification Schemes (SCS). Organizations that certify economic operators against the sustainability criteria, and ensure that economic operators calculate actual life cycle emissions values (if default values are not applied) using the agreed methodology. SCS define sustainability certification requirements, set requirements for certification bodies, auditors and accreditation bodies, and monitor effectiveness of the assurance system.

4. General requirements

CB should ensure to meet the following requirements.

- “CORSlA Eligibility Framework and Requirements for Sustainability Certification Schemes” March 2024, 2. ELIGIBILITY REQUIREMENTS. Table 5. Requirements set by SCS on Certification Bodies
- Accreditation and Auditing Standards.
 - 1) CB shall be accredited to ISO 17065 by an accreditation body operating in compliance with ISO 17011.
 - 2) CB should be accredited in accordance with Table 1, Requirement 9 of ICAO document - CORSlA Eligibility Framework and Requirements for Sustainability Certification Schemes.
 - 3) CB shall conduct assessments of GHG LCA values in line with ISO 14064-3.
 - 4) CB shall conduct audits in line with ISO 19011.
 - 5) CB shall inform ClassNK SCS immediately if the accreditation is suspended, withdrawn or terminated by the accreditation body.

If there have been revisions to the quoted ICAO document or later, the latest edition should be applied.

4.1 Legal and contractual matters

ISO/IEC 17065:2012, 4.1, shall be followed.

4.2 Management of impartiality

ISO/IEC 17065:2012, 4.2, shall be followed.

4.3 Liability and financing

ISO/IEC 17065:2012, 4.3, shall be followed.

4.4 Non-discriminatory conditions

ISO/IEC 17065:2012, 4.4, shall be followed.

4.5 Confidentiality

ISO/IEC 17065:2012, 4.5, shall be followed.

4.6 Publicly available information

ISO/IEC 17065:2012, 4.6, shall be followed.

5. Structural requirements

5.1 Organizational structure and top management

ISO/IEC 17065:2012, 5.1, shall be followed.

5.2 Mechanism for safeguarding impartiality

ISO/IEC 17065:2012, 5.2, shall be followed.

6. Resource requirements

6.1 CB personnel

ISO/IEC 17065:2012, 6.1 shall be followed.

In addition, CB should ensure to meet the following requirements.

- CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes March 2024, 2. ELIGIBILITY REQUIREMENTS, Table 5. Requirements set by SCS on Certification Bodies,
Auditor competencies
 - 1) CB shall appoint competent auditor(s), in accordance with the process set out in ISO 19011.
 - 2) The auditor(s) as a whole, and the independent reviewer, demonstrates knowledge and appropriate necessary skills to conduct audits under the CORSIA eligible fuels framework, in accordance with the audit scope, including:
 - a) Knowledge of the requirements of the SCS CORSIA certification programme and the ICAO documents and materials related to CORSIA eligible fuels.
 - b) Knowledge of and experience with CORSIA or similar sustainability criteria, mass balance systems, traceability, GHG LCA calculations, and data collection and handling.
 - c) Knowledge of and experience with appropriate sectors (e.g., agriculture, engineering, etc.).
- CB should have a process for managing competence of its personnel involved in the following activities.
 - 1) CORSIA Default Life Cycle Emissions Values for CORSIA Eligible Fuels, March 2024
 - 2) CORSIA Methodology for Calculating Actual Life Cycle Emissions Values, March 2024
 - 3) CORSIA Supporting Document, CORSIA Eligible Fuels – Life Cycle Assessment Methodology, Version5-June 2022.
 - 4) CORSIA Sustainability Criteria for CORSIA Eligible Fuels, November 2022.
 - 5) Guidance to Sustainability Certification Schemes (SCS) for application of CORSIA Sustainability Criteria, Themes 4 to 8, for CORSIA Sustainable Aviation Fuel produced on or after 1 January 2024, Version 5 – June 2022
- CB should follow the requirements of “P010 Competencies requirements for CB’s auditors”.

6.2 Resources for evaluation

ISO/IEC 17065:2012, 6.2, shall be followed.

7. Process requirements

7.1 General

ISO/IEC 17065:2012, 7.1, shall be followed.

In addition, CB should ensure to meet the following requirements.

- CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes March 2024, 2. ELIGIBILITY REQUIREMENTS, Table 5. Requirements set by SCS on Certification Bodies, 2. Audits and 5. Group auditing (where applicable).

Audit

- 1) CB should be recognized within its CORSIA certification programme apply the audit objectives to meet CORSIA certification requirements (Table 2, Requirement 3).
- 2) Initial audits should be performed on-site.
- 3) Subsequent audits should be performed on an annual basis.
- 4) SCS may permit remote audits by the CB under the following conditions:
 - a) The audit risk as assessed by the CB is low.
 - b) The same level of assurance can be achieved with remote audits as with on-site audits.
 - c) Sufficient traceability (mass balance) records, greenhouse gas data and other forms of appropriate evidence are available.
 - d) The systems in place for collecting and processing traceability and greenhouse gas data and ensuring data quality are reliable.
 - e) It is the responsibility of the CB to define the size of the sample of mass balance or GHG data to audit in consideration of the audit risk and the required level of assurance (see Table 5, Requirement 7).

Group auditing

- 1) Group auditing of economic operators by the CB is permitted under the following conditions:
 - a) For the following economic operators: producers of raw material, points of origin in the case of waste and residue supply chains, and warehouses or storage facilities under common management.
 - b) When confirming compliance with the CORSIA sustainability criteria when the areas concerned are near each other and have similar characteristics.
 - c) For the purpose of assessing the accuracy of the claimed LCA value when the units have similar production systems and products.
 - d) A sample of at least the square root of the number of group members is audited individually annually or, for wastes and residues, using a risk-based

- sampling approach providing the same level of assurance.
- e) Self-declarations from economic operators are not accepted by the CB as sufficient evidence to replace audits supporting a group claim.
- 2) A group value for actual life cycle emissions would be permitted.
CB should follow the requirements and guidance in “A001 APPENDIX 1 Group auditing requirements Section 4.1”.
- 3) If the conditions for group auditing are not fulfilled, economic operators are audited individually.
- CORSIA Sustainability Criteria for CORSIA Eligible Fuels, November 2022, Chapter 2. In assessing compliance with the sustainability criteria, SCS will apply only ICAO-approved sustainability criteria for the certification of CORSIA SAF, on the following basis:
 - 1) compliance with Themes 1 and 3 will be certified by CB.
 - 2) compliance with Themes 4 to 8 will be assessed by CB taking into account the guidance approved by the Council and in accordance with the following procedure:

Note; Guidance on the application of Sustainability Criteria, Themes 4 to 8, is available on the “CORSIA eligible fuels” website.

 - a) prior to CB conducting an assessment in a State in which it never operated before, the CB will consult with the competent authority of the State concerned, if required, in order to discuss the detailed process of assessment and for the CB to be fully aware of the national and local requirements applying to the production of SAF. In the case of States that establish such requirement, the assessment by CB will only take place after such consultations and common understanding between the competent authority and CB on the detailed process of assessment by the CB. With a view to implementing this consultation process, Member States which require consultation will notify ICAO which competent authority should be contacted by the SCS; and
 - b) in the case of diverging approaches between the competent authority and the CB, the Member State concerned may refer the matter to the ICAO Council to review the disagreement relating to the interpretation and application of the guidance for Themes 4 to 8. The review may include the support of relevant UN domain experts, as appropriate, on the request of the Member State. The Member State concerned will participate in this review process;

- 3) compliance with Themes 10, 11 and 12 can be demonstrated to the CB by a national attestation from the State in whose territory the SAF is produced, without further assessment by the CB;
compliance with Themes 13 and 14 will be demonstrated to the CB by the economic operator reporting to the CB the actions being taken to meet the related criteria, without further judgement of those actions by the CB.
- 4) CB should follow the requirements and guidance in "A002 APPENDIX 2 Application of sustainability criteria".

7.2 Application

ISO/IEC 17065:2012, 7.2, shall be followed.

In addition, CB should ensure to meet the following requirements.

- CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes March 2024, 2. ELIGIBILITY REQUIREMENTS, Table 5. Requirements set by SCS on Certification Bodies,
Transfer from one SCS to another.
 - 1) Prior to re-certification of an economic operator that was previously found to be in major non-conformity with any other SCS, the CB will be required to bring this to the attention of ClassNK SCS.

7.3 Application review

ISO/IEC 17065:2012, 7.3, shall be followed.

7.4 Evaluation

ISO/IEC 17065:2012, 7.4, shall be followed.

In addition, CB should ensure to meet the following requirements.

- CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes June 2022, 2. ELIGIBILITY REQUIREMENTS, Table 5. Requirements set by SCS on Certification Bodies,
Establishment of a level of assurance.
 - 1) CB shall conduct all audits to a reasonable assurance level.
 - 2) CB shall apply a materiality threshold of 5% for traceability (volume of sustainable material sold as compliant) and actual life cycle emissions values calculations.
- Audit processes
CB shall complete the following steps for the audit in line with ISO 14064-3.

- 1) Strategic analysis
CB should perform a strategic analysis to understand the activities and complexity of the economic operator, with respect to products linked to the feedback quantities, supply chain, acquisition process, life cycle stages, chain of custody, warehouses or storage facilities, certified material, point of origin, batches, mass balance system, emission crediting and to determine the nature and extent of the verification activities including the level of audit risk.
- 2) Risk assessment
CB should perform a risk assessment of the GHG statement to identify the risk of material misstatement or nonconformity with CORSIA sustainability criteria.
CB should assess the risk of misstatement and determine the nature and extent of evidence-gathering activities.
- 3) Evidence- gathering activities
CB should design evidence-gathering activities to collect sufficient and appropriate evidence upon which to base the conclusion. CB should obtain more persuasive evidence the higher the risk of misstatement. CB should consider inherent risk and detection risk in designing the evidence-gathering activities.
If sampling is used, CB should consider the purpose of the evidence-gathering activities and characteristics of the population from which the sample will be drawn when designing the sample.
- 4) Site visit
Site visit should be planned and performed as appropriate to gather information needed to reduce verification risk and to aid in the design of evidence-gathering activities.
On the basis of the risk assessment, CB should identify the need to visit sites and facilities, including the number and location to be visited.
CB should perform evidence-gathering activities at the site or facility to assess, as determined by the risk assessment.
- 5) Verification plan
CB should develop a verification plan that describes verification activities and schedule. The verification plan should be revised as necessary during the verification.
The evidence-gathering plan should be based on the results of the CB's risk assessment. It should be designed to lower the verification risk to an acceptable level.

6) Execution

CB should conduct the verification according to the verification plan and conduct the evidence-gathering activities according to the evidence-gathering plan.

7) Completion

CB should evaluate and document material misstatement.

CB should evaluate any nonconformity with the criteria.

CB should reach a conclusion based on the evidence gathered.

8) Verification report

CB should prepare a verification report.

7.5 Review

ISO/IEC 17065:2012, 7.5, shall be followed.

7.6 Certification decision

ISO/IEC 17065:2012, 7.6, shall be followed.

7.7 Certification documentation

ISO/IEC 17065:2012, 7.7, shall be followed.

In addition, CB should ensure to meet the following requirements.

- CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes June 2022 2. ELIGIBILITY REQUIREMENTS, Table 5. Requirements set by SCS on Certification Bodies,

Certificate Issuance

- 1) CB should issue a certificate to an economic operator only after a positive certification decision is reached confirming that the requirements of ClassNK SCS CORSIA certification programme have been satisfied.

7.8 Directory of certified products

ISO/IEC 17065:2012, 7.8, shall be followed.

7.9 Surveillance

ISO/IEC 17065:2012, 7.9, shall be followed.

7.10 Changes affecting certification

ISO/IEC 17065:2012, 7.10, shall be followed.

7.11 Termination, reduction, suspension or withdrawal of certification

ISO/IEC 17065:2012, 7.11, shall be followed.

The CB should suspend certification in cases when, for example:

- The certified economic operator has persistently or seriously failed to meet the certification requirements;
- The certified economic operator does not allow surveillance audits to be conducted at the required frequencies;
- The certified economic operator has voluntarily requested a suspension.

Under suspension, the economic operator's certification is temporarily invalid.

The CB should restore the suspended certification if the issue that has resulted in the suspension has been resolved. Failure to resolve the issues that have resulted in the suspension in a time established by the CB should result in withdrawal or reduction of the scope of certification.

NOTE In most cases, the suspension would not exceed six months.

The CB should reduce the scope of the certification to exclude the parts not meeting the requirements, when the certified economic operator has persistently or seriously failed to meet the certification requirements.

Short-notice audits

It may be necessary for the CB to conduct audits of certified economic operator as short notice or unannounced to investigate complaints, or in response to changes, or as follow up on suspended economic operator,

In such cases;

- a) The CB should describe and make known in advance to the certified economic operator (e.g. in documents) the condition under which such audit will be conducted:
- b) The CB should exercise additional care in the assignment of the audit team because of the lack of opportunity for the economic operator to object to audit team members.

Notification to ClassNK SCS

The CB should inform the ClassNK SCS of any final decision of termination, reduction, suspension or withdrawal of certification within two (2) days of the decision.

Fraudulent Behaviour"

"IAF ID 15:2023 Dealing with Fraudulent Behaviour" should be considered if CB is involved in fraudulent behaviour by an economic operator.

Obligations to CB can be broadly represented as:

- Report instances of fraudulent behaviour
- Investigate any allegations made against their certified clients and take timely actions to suspend or withdraw certification if necessary
- Verify the implementation of measures taken by their certified client.

7.12 Records

ISO/IEC 17065:2012, 7.12, shall be followed.

Records shall be kept for a minimum of 10 years.

7.13 Complaints and appeals

ISO/IEC 17065:2012, 7.13, shall be followed.

8. Management system requirements

8.1 Options

ISO/IEC 17065:2012, 8.1, shall be followed.

8.2 General management system documentation (Option A)

ISO/IEC 17065:2012, 8.2, shall be followed.

8.3 Control of documents (Option A)

ISO/IEC 17065:2012, 8.3, shall be followed.

8.4 Control of records (Option A)

ISO/IEC 17065:2012, 8.4, shall be followed.

8.5 Management review (Option A)

ISO/IEC 17065:2012, 8.5, shall be followed.

8.6 Internal audits (Option A)

ISO/IEC 17065:2012, 8.6, shall be followed.

8.7 Corrective actions (Option A)

ISO/IEC 17065:2012, 8.7, shall be followed.

8.8 Preventive actions (Option A)

ISO/IEC 17065:2012, 8.8, shall be followed.

ISO/IEC 17065:2012

Annex A (informative) Principles for product CB and their certification activities

Annex B (informative) Application of this International Standard for processes and services

Bibliography

ClassNK SCS

Certification for CORSIA Eligible Fuels

Requirements for Certification Bodies April 2024

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