



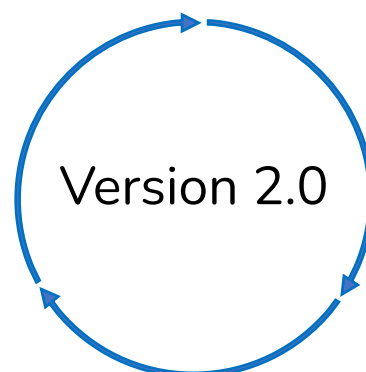
# Procedures

of the Voluntary Programme  
on Circular Economy





## Procedures of the Voluntary Programme on Circular Economy



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## Abbreviations and acronyms

<b>HDPE</b>	High density Polyethylene
<b>IAF</b>	International Accreditation Forum
<b>ISO</b>	International Organization for Standardization
<b>LDPE</b>	Low density Polyethylene
<b>PDD</b>	Project Description Document
<b>PET (o PETE)</b>	Polyethylene terephthalate
<b>PP</b>	Polypropylene
<b>PS</b>	Polystyrene
<b>PVC</b>	Polyvinyl chloride
<b>VVB</b>	Validation and Verification Body

## 1 Introduction

This document presents the processes related to Global Zero Waste and Cercarbono's Voluntary Programme on Circular Economy. It is complementary to its Protocol<sup>1</sup>.

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<sup>1</sup> Document available at [www.cercarbono.com](http://www.cercarbono.com).

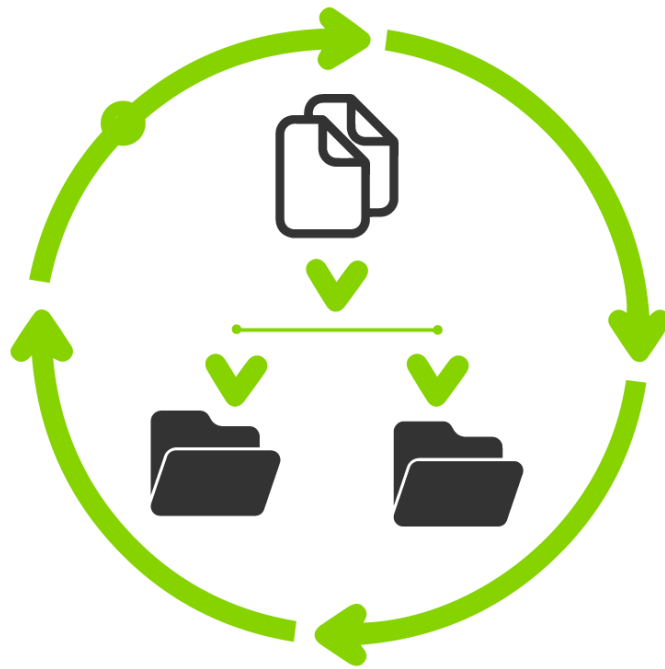
## 2 Document production

The production, review, approval, and publication of Voluntary Programme on Circular Economy documents will be conducted by the programme technical committee composed of a Global Zero Waste delegate and a Cercarbono delegate. When necessary, support from EcoRegistry members, external consultants, or sectoral experts is requested.

The programme has a documentary database in which each document is continuously monitored in terms of its validity, translated versions, production and update cycle, and special requirements. It also has a document repository stored in the cloud, where all the programme's documents are archived.



# Administrative Procedures



### 3 Certification cycle procedures

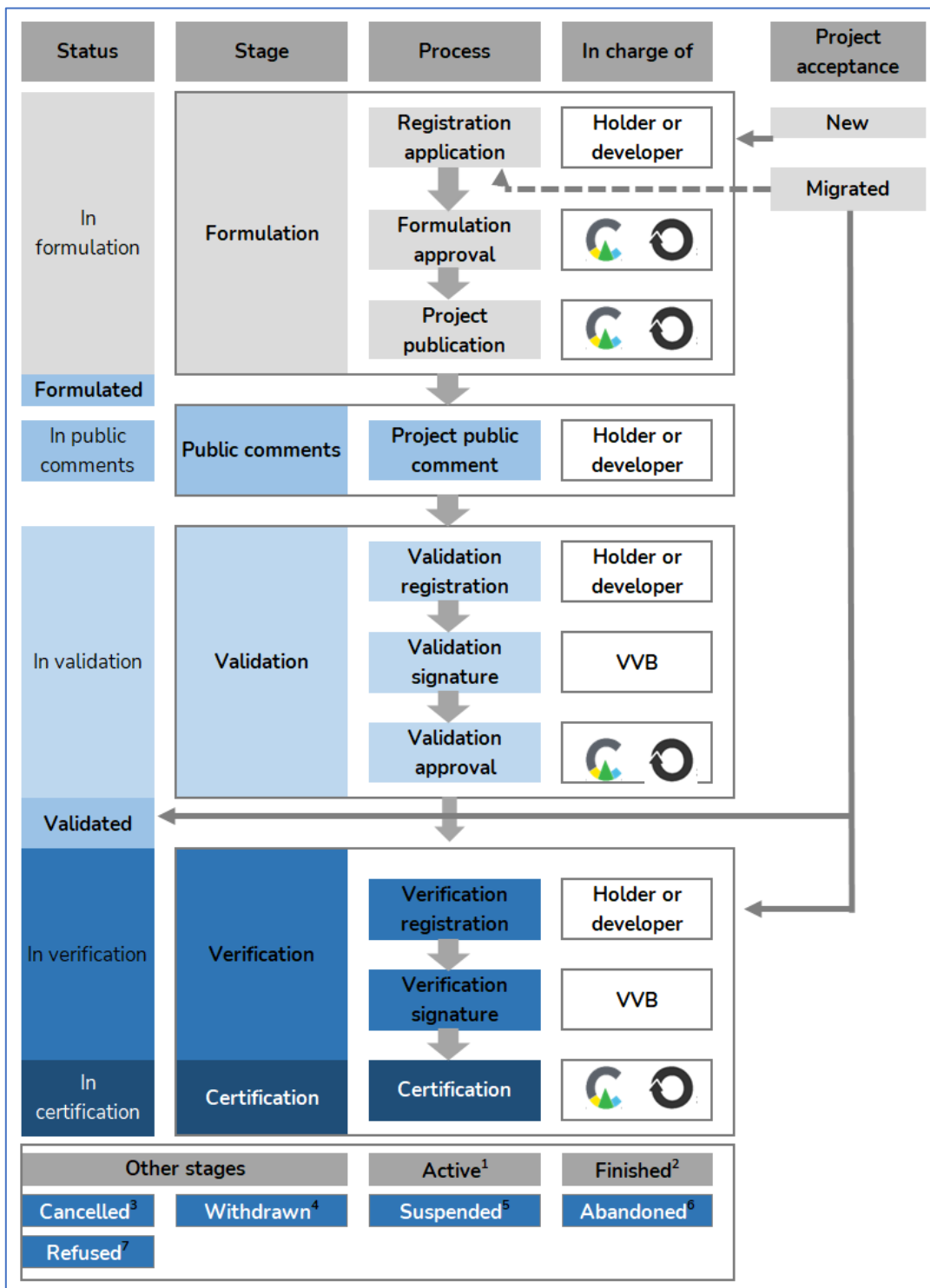
The stages of the certification process are formulation, validation, verification, and certification<sup>2</sup>. Depending on the status of a Project on Circular Economy Material in any of these stages, it may be in one of the following statuses according to its level of compliance with the stages: In formulation, Formulated, In public comments, In validation, Validated, In verification and In certification. Additionally, the projects can also be in the following statuses, outside the stages of the certification process: Active, Finished, Cancelled, Withdrawn, Suspended, Abandoned and Refused.

The stages of the certification process are schematically presented in [Figure 1](#) and developed in the following tables of the section. The documentation required at each stage is standardised for the projects according to the reduction and recirculation activities, and the formal and methodological requirements.

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<sup>2</sup> Implementation, i.e. the process by which the holder or developer of the project executes the project activities set out in the PDD, whereby material reduction or recirculation is carried out, and monitoring, i.e. the process of carrying out measurements and calculations of material reduction or recirculation, following the monitoring plan under the PDD, are not detailed in this section as they are internal processes of the projects.

**Figure 1.** States, stages, processes, and responsible parties for certification in the programme.



1. Project in implementation that is not at any other stage.
2. Project that has reached the end of its lifespan.
3. Project that the holder or developer decides not to continue and requests its deregistration.
4. Project that the holder retires from the programme.
5. Inactive project due to sanction.
6. Project inactive for so long that it cannot be reactivated.
7. When a project doesn't comply with the requirements of the programme it will be rejected.

### 3.1 Project formulation and registration

**Table 1** details the procedures projects must comply with, once they have been formulated, to be registered and published on the EcoRegistry platform as a new project or as a migrated project from another certification programme.

**Table 1.** Procedures for projects formulation and registration.

Stage, Process, Status	Action	Documentation	In charge	Time
<b>Stage: Formulation. Status: In formulation.</b>				
Review of basic client documentation and compliance with requirements for publication on the EcoRegistry platform.				
<b>Application for project registration</b>	Holder or developer of the project uploads the required information to the platform.	Contract or service order.	Project.	Depends on the project.
		Proof of holdership or tenure of the project area or facility.		
		Power of attorney (if applicable).		
		Statement of programme change (if migrated).		
		Evidence of withdrawal from the original programme (if migrated).		
		Project Description Document (public comments version).		
		Location of the project (KML format or coordinates link from a georeferencing platform such as Google Maps).		
<b>Approval of the formulation</b>	The programme	Formulation approval form.	Technical team.	3 business days.

Stage, Process, Status	Action	Documentation	In charge	Time
<b>Project publication</b>	technical team reviews compliance with requirements. Initial review of no double counting.		Technical team.	1 business day.
<b>Result:</b> Project in <b>Formulated</b> status and published on the registry platform.				

### 3.2 Public comments to the project

Once the formulation is approved, the public comment period of the project starts on the Cercarbono website, which links to the project file on the registry platform. This stage remains open for 30 calendar days.

After the public comment period is over, the programme collects all comments received and generates a compiled document which becomes part of the project file in EcoRegistry and is available to the validating VVB. The programme may take actions as required, depending on the nature of the comments received. The procedure for this step is presented in [Table 2](#).

**Table 2.** Procedures for the public comment period of the projects.

Stage, Process, Status	Action	Documentation	In charge	Time
<b>Stage: Public comments. Status: In public comments.</b>				
<b>Project public comments</b>	The programme makes the project information available for public comment.	Project Description Document (version to be reviewed by the VVB) <sup>1</sup> .	Programme.	30 calendar days.
	The programme technical team reviews comments received, saves their compilation in the project's file on the registry platform and communicates to the project the required actions.	Comments received. Compilation of comments and required project actions (if any).	Technical team.	7 business days, according to the complexity of comments.

Stage, Process, Status	Action	Documentation	In charge	Time
	Project addresses comments and uploads updated documentation to the registration platform.	Project documentation updated as required.	Project.	Depends on the project.

<sup>1</sup> The Project Description Document (PDD) confidential sections may be omitted. See [Section 10](#).

### 3.3 Project validation

The projects that are active in the programme and undergoing the process of renewing their accreditation period or updating their baseline, must also carry out the procedure presented in the [Table 3](#).

**Table 3.** Procedures for projects validation.

Stage, Process, Status	Action	Documentation	In charge	Time
<b>Stage: Validation. Status: In validation.</b>				
Review of validation and compliance documents for approval.				
<b>Registration of validation</b>	The holder or developer of the project fills in the information and uploads the required documentation.	Contract or service order.	Project.	Depends on the project.
		Validation calculations.		
		Project Description Document.		
		Supporting validation documents.		
<b>Signing of the validation</b>	The VVB uploads validation information and signs the validation of the project.	Declaration conflict of interest of the validator.	VVB.	Depends on the VVB.
		Validation findings report (if applicable).		
		Validation report and appendices.		
		Validation statement.		
<b>Approval of validation<sup>1</sup></b>	The technical team reviews and approves the project at the validation state.	Independent validation approval report.	Certifier.	Up to 10 business days.
<b>Result:</b> Project in <b>Validated</b> status.				

<sup>1</sup> Only if project does not do joint validation and verification.

### 3.4 Project verification

Only those projects active on the EcoRegistry platform will be able to carry out the registration and signing of the verification. The details of the verification procedures are presented in the [Table 4](#).

**Table 4.** Procedures for projects verification.

Stage, Process, Status	Action	Documentation	In charge	Time
<b>Stage: Verification. Status: In verification.</b>				
Review of verification documents and compliance with requirements to start certification.				
<b>Registration of verification</b>	The holder or developer of the project fills in the information and uploads the required documentation.	Verification calculations.	Project.	Depends on the project.
		Verification supporting documentation.		
		Monitoring report.		
<b>Signing of the verification</b>	The VVB uploads verification information and signs the project verification.	Declaration conflict of interest of the verifier.	VVB.	Depends on the VVB.
		Verification findings report (if applicable).		
		Verification report and appendices.		
		Verification statement.		
		Verified calculations.		
<b>Result:</b> Project in a <b>Verified</b> status.				

### 3.5 Project joint validation and verification

Projects may choose to apply for joint validation and verification or to go through these processes separately. If joint validation and first verification is performed, the approval of validation and verification will occur during the certification stage. The procedure's details are presented in [Table 5](#).

**Table 5.** Procedures for projects joint validation and verification.

Stage, Process, Status	Action	Documentation	In charge	Time
<b>Stage: Joint validation and verification. Status: In joint validation and verification.</b>				
Review of validation and verification documentation and compliance with requirements for approval.				
<b>Signing of the joint validation and verification</b>	The VVB uploads information on the joint validation and verification and signs the joint validation and verification of the project.	Declaration of conflict of interest in joint validation and verification.	VVB.	Depends on the VVB.
		Joint validation and verification findings report (if applicable).		
		Joint validation and verification report and appendices.		
		Joint validation and verification statement.		
<b>Approval of joint validation and verification</b>	The technical team reviews and approves the project at the joint validation and verification stage.	Joint validation and verification approval report.	Certifier.	Up to 10 business days.
<b>Result:</b> Project in <b>Verified</b> status.				

### 3.6 Project certification

At this stage, active projects or migrated projects from other certification programmes will be able to move to this stage of certification. The procedures to be completed by these projects are detailed in [Table 6](#) below.



**Table 6.** Procedures for projects certification.

Stage, Process, Status	Action	Documentation	In charge	Time
<b>Stage: Certification.</b>				
Review of compliance with requirements for certification of reported material <sup>3</sup> reduction or recirculation during the verified period and issuance of Circular Credits.				
<b>Certification</b>	The technical team reviews the validation and verification documentation and generates the certification report. The directors of Cercarbono and Global Zero Waste sign the corresponding certificate.	That generated by the developer and by the VVB in validation and verification stage.	Certifier.	Up to 15 business days.
		Certification report.		
		Certificate for signature by the director.		
<b>Issuance and registration of the certificate</b>	The directors of Cercarbono and Global Zero Waste sign the certificate, and the credits obtained are registered on the EcoRegistry platform.	Issuance of the certificate of Circular Credits.	Cercarbono and Global Zero Waste directors.	Up to 5 business days.
<b>Result:</b> Project in <b>Active</b> status.				

Once the Certification stage is completed and credits are issued, the project enters the **Active** status, indicating that it is in the process of implementation and would eventually request future verification, as the programme does not certify projects but their reduction or recirculation of materials.

Finally, other projects statuses may occur, as detailed in [Table 7](#).

<sup>3</sup> For the programme, materials are understood as all waste materials that can be used.

**Table 7.** Other possible projects statuses.

Status	Action	Documentation	In charge	Time
Other projects possible statuses.				
<b>Finished</b>	Occurs when a project reaches the end of its lifetime or crediting periods with no possibility to extend them.	Not required.	Person designated by the programme.	Up to 5 business days.
<b>Cancelled</b>	If a holder or developer decides not to continue the implementation of a project and requests to deregister, it will be registered as Cancelled in the EcoRegistry platform.	Letter of request for cancellation.	Project.	Depends on the project.
		Certificate of cancellation signed by the directors of Cercarbono and Global Zero Waste.	Person designated by the programme.	Up to 5 business days.
<b>Withdrawn</b>	If a holder or developer decides to withdraw a project from the programme (e.g., for migration to another standard) and requests its withdrawal, it will be registered as Withdrawn on the EcoRegistry platform.	Letter of request for withdrawal.	Project.	Depends on the project.
		Withdrawal certificate detailing the status of the project, and its credits signed by the directors of Cercarbono and Global Zero Waste.	Person designated by the programme.	Up to 5 business days.
<b>Suspended</b>	Occurs when a project has been sanctioned for non-compliance with programme rules or legal irregularities.	Depends on the case.	Person designated by the programme.	Depends on the case.
<b>Abandoned</b>	If a project has not performed a verification for more than five years and does not proceed as set out in section <b>Deadlines for verification events</b> of the <b>Protocol</b> , the programme will register it as	Not required.	Person designated by the programme.	Up to 5 business days.
		Certificate detailing the status of abandonment signed by the directors of		

Status	Action	Documentation	In charge	Time
	Abandoned on the EcoRegistry platform.	Cercarbono and Global Zero Waste.		
<b>Refused</b>	If upon review of the validation and verification documentation, the technical team issues a negative certification report, the project will be considered as rejected.	Negative programme certification report. Rejection report.	Certifier.	Up to 15 business days.

## 4 Procedures for reviewing methodological elements

### 4.1 Additionality

Project additionality is defined in the programme methodologies; the developer must support the additionality of the project according to the selected methodology in the PDD.

The first review of the additionality must be carried out by the VVB in charge of validation. The additionality should be reviewed by the programme technical team during the validation approval or joint validation and verification stage.

During the implementation of the project, an additionality analysis must be performed when new instances are added in grouped projects and reviewed by the VVB during verifications.

For the renewal of the accreditation period, a new additionality analysis is required.

In turn, the programme technical team reviews the additionality during certification.

The PDD, validation report (or joint validation and verification) and certification report templates have specific sections for the submission and assessment of the additionality.

### 4.2 Baseline and project scenarios

The baseline and project scenarios must be submitted by the projects in their PDD and must be reviewed by the VVB in the initial validation, as well as in their revalidation, either by renewal of the accreditation period or by the inclusion of new instances in grouped projects.

The PDD, monitoring report, validation report, verification report (or joint validation and verification) and certification report templates have specific sections for the presentation and assessment of both scenarios.

The review of these scenarios should be done in parallel with the review of additionality due to their close relationship.

## 5 Circular Credits procedures

In order for material reduction or recirculation actions to be real and effective, it is necessary to ensure compliance with the principles of transparency and environmental integrity of the Circular Credits generated by the projects.

This section includes all the procedures the programme has established for the Circular Credits during the full lifespan of the projects.

Therefore, the programme focuses its efforts on collaborating in the construction of a reliable and transparent market, a scenario in which the need to align the programme's own policies with market mechanisms and national circular economy policies, or policies related to material flows established in the different countries participating in the voluntary market for Circular Credits becomes evident, to achieve the objective of preventing double counting of the credits issued.

### 5.1 Emission

The issuance of Circular Credits is part of the certification stage of the programme (**Figure 1**). Projects must have successfully completed the formulation, validation, and verification stages, in addition to the internal design, implementation and monitoring stages.

For the Circular Credits issuance, the project certifier issues a Certification Report, which considers the main elements contained in the PDD, in the monitoring report and in the validation (when applicable) and verification reports.

During the review process, the certifier may identify facts that need to be documented, justified, or corrected, mainly because they go against the activities proposed by the projects. These findings must be notified to the project holders or developers or to the VVBs, as appropriate, as they need to be corrected in the corresponding instance to be able to generate the final certification report. Once the certifier is sure that all the project documentation is complete and that the different corrections identified have been made, he/she will issue the report duly completed and signed.

Once the report has been issued, a certificate of Circular Credits issuance is generated, which includes the assignment of the serial numbers for each metric tonne of materials reduced or recirculated by the project. This certificate lists the number of Circular Credits issued by EcoRegistry under a unique serial number, an indefinite validity of the Circular Credits, a total duration of the project, as well as the VVBs that validated and verified it.

## 5.2 Registration

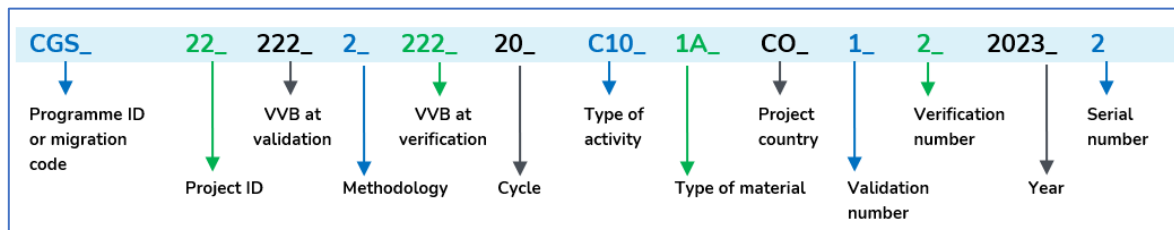
The development of a transparent market requires unbiased information through the implementation of processes and record-keeping systems publishing the correct information for each stage. Users must be able to recognise all transactions and traceability of Circular Credits, e.g., where they come from, how they have been traded and who the final beneficiary of each material unit is. The programme ensures this through its registration platform called EcoRegistry, based on blockchain technology, where projects holders enter the information on their material reduction or recirculation initiatives required by the programme.

In EcoRegistry, the units of reduced or recirculated materials are registered and issued via programme-approved information flows. The total volume of Circular Credits referred to in the certification, which corresponds to the total volume of credits issued by the programme, is issued, and linked to the registration of the project in the registration platform.

EcoRegistry guarantees the secure issuance, tracking and transfer of all Circular Credits, in line with the principle of transparency and avoiding double counting. It also publishes the information necessary for users to be able to recognise the origin, traceability, and final beneficiary of the credits.

The information on each project is always available on the EcoRegistry website ([www.ecoregistry.io](http://www.ecoregistry.io)). All projects are listed with their general information as well as the supporting documentation for each stage. Once credits are generated, the accounting table for each project can identify the credits issued, available, transferred and retired, so that this information can be accessed by anyone. The system provides a unique serial number for each tonne of material reduced or recirculated. The serial number contains all relevant information about the project, as shown in **Figure 2**. The corresponding coding of project activities, activity type and type of material is presented in **Figure 3**.

**Figure 2.** Description of the components of the serial number assigned to each Circular Credit.



**Figure 3.** Coding for activities, type of activity, and type of material.

Cycle	Type of activity	Type of material	
19: Biological	C10: Reject	A. Plastic	1A: PET
20: Technological	C11: Rethink		2A: HDPE
	C12: Reduce		3A: PVC
	C20: Reuse		4A: LDPE
	C21: Repair		5A: PP
	C22: Refurbish		6A: PS
	C23: Remanufacture		7A: OTHER
	C24: Repurpose		
	C25: Recycling		

### 5.3 Withdrawal

Withdrawal consists of the permanent allocation of a quantity of certified Circular Credits in favour of an end-beneficiary, i.e., a Circular Credit can only be withdrawn once; it cannot be recirculated, it is deducted from the total available certified credits of the project, so that it cannot be used twice.

To make withdrawals, the user who has custody of the Circular Credit must log in with their username and password to the platform and click on the option to withdraw certificates. There they must enter the following information:

- Project from which the reduced or recirculated material units are to be withdrawn.
- Year in which the reduction or recirculation of materials is generated.
- Quantity of Circular Credits to be withdrawn.
- Reason for retirement: voluntary compensation, tax, or other specific compensation scheme.
- Language of the certificate.
- End-user information: country where located, name, document type and ID number.
- Taxable person information, if applicable: country where located, name, document type and ID number.
- Entry of the verification code sent to the mail to carry out the transaction.

The withdrawal certificate issued has the following information:

- Certification programme.
- Date of withdrawal of the Circular Credits.
- Name and ID of the project.
- Name and ID of the project holder.
- Number of Circular Credits withdrawn.
- Serial numbers of the withdrawn Circular Credits.
- Period of the recalled Circular Credits.

- Name or company name and tax identification number or code of the end user of the Circular Credit for the purposes of voluntary compensation or other market mechanisms.
- Accreditation period of the project.
- Stamp of the intended use of the withdrawn certificates.
- ID of the certificate of withdrawal from the project.
- QR code for information authentication.

This certificate of withdrawal of the Circular Credits is generated in PDF format, with electronic signature and can be printed without losing its authenticity, as soon as it is verified against the original issued electronically by EcoRegistry, which is accessed through the e-mail address provided by EcoRegistry, using the verification code assigned by it.

The EcoRegistry registration platform transparently documents the retirement process of the Circular Credits of each project. It publicly shows the number of certificates issued, withdrawn and available for each year in which they were generated, as well as indicating, the year, the reduction or recirculation of materials.

## 5.4 Transfer

The transfer process consists of the handover of a certain amount of Circular Credits between accounts registered in EcoRegistry. This process involves changing the account holding the Circular Credits. The transfer functionality allows market transfer dynamics to be reflected in the registry, ensuring traceability of information.

The transfer of Circular Credits is carried out automatically under a self-management logic by a general or developer account type user (when applicable). To do so, the user who has the Circular Credit must log in with their username and password to the platform and click on the Transfer certificates option. There they must enter the following information:

- Project from which the Circular Credits are to be transferred.
- Period or vintage of the Circular Credits to be transferred.
- Amount of Circular Credits to be transferred.
- Selection of the account to which the credits are to be transferred.
- Verification code sent to the mail to carry out the transaction.

The transaction can be confirmed via the **Transfer History** tab, which records the following information on all transfers sent and received by the user:

- Type of transaction: sending or receiving Circular Credits.
- Project generating the Circular Credits.
- Serial transferred.
- Number of Circular Credits transferred.



- Interaction user of the transfer.
- Date of the transfer.

Each transfer and its information, including the holders of each unit of materials, is traceable by the platform through blockchain technology. Historical transfer reports can be generated automatically by the registry administrator.

## 5.5 Cancellation

This is the process where credits registered on the programme registration platform are disabled from performing any of the to be implement with the Circular Credits before the credits are retired.

The cancellation of credits is defined by the programme according to the relevant situation. The situations in which a Circular Credits cancellation is necessary and the procedure to be followed are presented in **Table 8**.

**Table 8.** Situations requiring cancellation of Circular Credits.

Situation	Responsible for the request	Procedure
Conversion of Circular Credits to another standard.	The holder of the credits must apply to the programme.	The holder must send an email to <a href="mailto:globalzerowaste@cercarbono.com">globalzerowaste@cercarbono.com</a> requesting the conversion, including the following information: <ul style="list-style-type: none"> <li>- Name of the project.</li> <li>- ID of the project in EcoRegistry.</li> <li>- Number of credits to be cancelled with their respective serial numbers.</li> <li>- Letter of cancellation acceptance by the holder.</li> </ul>
Migration of a project from the programme to another standard with available credits.	The project holder must make the application to the programme.	The project holder must send a formal letter to the programme requesting the migration of the project to another standard, clarifying the need for the cancellation of the credits. The letter must be duly signed by the holder.
Double counting event.	Programme notifies the project holder.	In the event of double counting of project credits, it is possible that the programme, within the options of compensation mechanisms, evaluates the possibility of cancellation of these credits, which will be duly communicated to the project holder.

If the credits were previously transferred to other accounts, it is not possible to request cancellation.

## 5.6 Conversion of credits to Circular Credits

This process consists of converting Circular Credits obtained from material reduction or recirculation activities, which have been cancelled and transferred from a standard or certification programme to the programme by migrating the project to the programme registry or without the need for such migration.

Only the credits that have not been traded under the registration of the standard or certification programme from which they originate can be converted to Circular Credits. The conversion of credits generated in another standard or certification programme is studied on a case-by-case basis, as the verification event under which they were generated (as well as relevant supporting documentation), the certification programme from which they originate, the VVB in charge of verification, and other relevant elements of the project are reviewed in depth.

Following this study, the exact number of credits (indicating the year associated with the results of the project activity) that can be converted to Circular Credits through EcoRegistry by external transfer is determined.

The programme ensures that this process does not generate double counting by guaranteeing full compliance with the procedures and stages defined here.

When credit conversion processes are carried out without the migration of the originating project, the programme registration platform will indicate that the credits are registered, but not the project.

### 5.6.1 Requirements

The requirements for the conversion of credits are listed below:

- **Procedures of the originating standard or programme:** the originating standard or programme must have policies and procedures for the cancellation of credits to ensure that double counting does not occur.
- **Activities:** the conversion of credits is accepted in all activities enabled in the programme.

Credits to be converted must have a recent certification from the originating standard or programme indicating the following:

- The standard or programme under which the credits were certified.
- The name of the project.
- The type of project activity (material reduction or recirculation).
- The number of credits from the project that have been issued, traded and available.

- The generation years (vintage) and serial numbers of the credits to be transferred.
- The cancellation and transfer of credits with their respective serial numbers.
- The monitoring and verification reports supporting the issuance of the credits to be converted.

In the case of conversion of credits from more than one project, separate applications must be submitted for each project.

### 5.6.2 Application and process

The application for conversion, together with the supporting documentation, must be reviewed by the technical team in charge of certifications, which analyses the technical conditions for the verification of the proposed credits and determines whether it is feasible. For this purpose, the technical team may require additional documentation or answers to specific questions.

If the conversion is approved, the programme registry assigns serial numbers to the converted credits.

Summarily, the steps defining the conversion of credits to Circular Credits are presented in the [Table 9](#).

**Table 9.** Conversion steps from credits to Circular Credits.

Step	Description	Responsible	Time
<b>Cancellation</b>	The holder or authorised representative of the Circular Credits must request the cancellation of these credits from the standard or programme, or from the registry.	Holder or authorised representative.	Depends on the standard or programme of origin.

Step	Description	Responsible	Time
<b>Application to programme</b>	The form <i>Application for Conversion of Circular Credits from other Standards or Programmes to the Voluntary Programme on Circular Economy</i> , available at <a href="http://www.cercarbono.com">www.cercarbono.com</a> , must be filled and submitted. Once the form has been filled in, the formal application is sent to <a href="mailto:globalzerowaste@cercarbono.com">globalzerowaste@cercarbono.com</a> , where the form and the monitoring and verification report corresponding to the credits are attached.	Holder or authorised representative.	Depends on the holder of the credits.
<b>Review of documentation</b>	The technical team is responsible for verifying that the minimum parameters for the evaluation of the application are met. Once they are met, the secretariat is responsible for sending it to the technical management.	Technical team.	2-3 business days.
<b>Assessment of the application</b>	The technical team analyses and assesses the feasibility of converting the credits to Circular Credits.	Technical team.	4 business days.
<b>Response to the application</b>	The technical team sends a response to the holder or authorised representative approving or refusing the conversion of the credits.	Technical team.	1 business day.
<b>Account creation on the registration platform</b>	An account is created for the holder or authorised representative in EcoRegistry.	Administrator of the programme registry.	4 business days.
<b>Certification and issuance of credits</b>	The technical team generates the certification and credit issuance, as well	Technical team.	1 business day.

Step	Description	Responsible	Time
	as the documentation of the process.		
<b>Registration of credits</b>	EcoRegistry registers credits on the registration platform.	EcoRegistry.	1 business day.

## 5.7 Reallocation of Circular Credits

If a project wishes to change the destination of credits earned or to be earned, it should take into account the considerations in [Section 6](#).

## 6 Double counting

Double counting is a practice in which the Circular Credits generated by the projects are counted or claimed more than once, which represents a deviation from the optimal use of resources for materials circularity, a situation that certification schemes such as the Voluntary Programme on Circular Economy must control and avoid. Double counting of credits is often represented by double issuance, double use, and double claiming (see [Figure 4](#)). It is therefore necessary to understand them separately, as the prevention mechanisms implemented in each case are different.

**Figure 4.** Double counting of Circular Credits.

Double issuance	Double use	Double claim
Occurs when more than one Circular Credit is issued for the same reduction or recirculation of materials.	Occurs when the same Circular Credit issued is counted more than once.	Occurs when there is more than one claimant (entity) in order to demonstrate the achievement of their materials circularity (reduction or recirculation) objectives.
Example:	Example:	Example:
The same unit of material (reduction or recirculation) is registered in two different certification schemes.	The same unit of material (reduction or recirculation) is used more than once by its holder.	The same unit of materials (reduction or recirculation) is reclaimed for use by an entity.

### 6.1 Mechanisms to avoid double issuance

Whenever a project is registered, all the holders of the projects must be identified by providing the supports registered in the PDD, as well as the exact location of the areas or operating units that make up the project by using KML formats or a link to the coordinates of a georeferencing platform such as Google Maps.

The information on holdership and authority for project development is reviewed by the VVB in the validation and verification processes.

The holdership of the Circular Credits is always defined in the issuance certificates and in the withdrawal certificates.

### 6.1.1 Available information on the holder and the location of the project

By means of a contract signed between the three parties (project holder, Cercarbono and Global Zero Waste), the holder declares that the project is their legitimate and exclusive property. In addition, the holder declares that (at the time of applying for certification and subsequent registration of the materials reduction or recirculation certificates) they are not aware of the fact that:

- These have been, are being, or will be certified or registered in other registry systems.
- Concurrent benefits have been obtained from them contrary to the law.
- They are being used for multiple accounting purposes to obtain additional benefits.

### 6.1.2 Contractual declaration by the holder of the project

By means of a contract signed between the three parties (project holder, Cercarbono and Global Zero Waste), the holder declares that the project is their legitimate and exclusive property. In addition, the holder declares that (at the time of applying for certification and subsequent registration of the materials reduction or recirculation certificates) they are not aware of the fact that:

- These have been, are being or will be certified or registered in other registry systems.
- Concurrent benefits have been obtained from them contrary to the law.
- They are being used for multiple accounting purposes to obtain additional benefits.

### 6.1.3 Review of project's status in other certification programmes

As part of the project registration approval process, the programme performs an inspection on other registration platforms to ensure that the project is not already registered in another registry, this information should also be reviewed by the VVB in the validation and verification processes.

## 6.2 Mechanisms to avoid double use

A robust registration system or platform is an essential tool to ensure accuracy in the accounting of material reduction and recirculation actions and to prevent the risk of double counting. The programme uses the EcoRegistry registry platform to guarantee the different Circular Credits procedures.

programme-certified Circular Credits are only issued once. This implies that a given credit can only be used in the framework of a compliance scheme (national or international), as assessed in the certification process.

EcoRegistry works efficiently by allowing the user to enter information on the final destination of the credits. Thus, the programme issues its credits specifying their final use in national, corporate, or independent circularity initiatives, such as material taxes (e.g., plastic taxes), tax exemption mechanisms for the certification of materials circularity and own, independent, or other voluntary purposes.

Double use is also avoided by using the EcoRegistry platform, as when a unit of materials is removed from the platform, the token<sup>4</sup> representing that unit within the blockchain goes to a burn address, i.e., an inaccessible place to take them out of circulation.

All this is supported by the assignment of a unique serial number to each Circular Credit, which is assigned by the EcoRegistry platform, thus ensuring that no double use of these credits is generated.

The EcoRegistry platform publicly indicates, within each project's retired certificate information, whether or not a given offset credit has been qualified by the certification programme for use under an offset or material reduction scheme.

### 6.3 Mechanism to avoid double claim

The tools established to avoid double claim are primarily intended to be used under voluntary compensation schemes, tax or other specific compensation schemes involving several countries in their development and end-use.

#### 6.3.1 Attributes assigned to Circular Credits

The main attributes of the serial numbers assigned by the registry system, that facilitate the process of identifying offset Circular Credits to avoid double claim, are the identification of the country where the project was developed, and the year associated with the occurrence of the reduction or recirculation of materials.

#### 6.3.2 Double counting procedures

If double counting is identified, the programme, through its registry, defines procedures to cancel or block the offset Circular Credits that were double claimed and immediately informs the actors involved.

Depending on the situation and the seriousness of the occurrence, the technical committee of the programme defines the sanction to be applied:

- **Minimum sanction:** cancellation or blocking of Circular Credits that were subject to double counting.

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<sup>4</sup> These are units of value, which represent Circular Credits in a digital form.



- **Moderate sanction:** forced compensation consisting in the registry system taking a certain amount of Circular Credits, defined by the programme, to compensate for the occurrence of double counting.
- **Severe sanction:** invalidation of the entire project.
- **Maximum sanction:** in addition to the invalidation of the entire project, the holder of the project is permanently disqualified from registering a project in the programme.

For minimum and moderate sanctions, the technical committee may request additional actions from the project holder to help compensate the double-counting occurrence.

Depending on the technical committee's assessment, the user's access to the platform may be blocked or conditioned to be authorised by the programme for each movement on the platform.

All procedures are focused on preventing double counting, but if double emission or double use of previously traded credits should occur, the programme will bring enforcement actions against the holder involved with the sole objective of compensating the purchaser of the credits for the damages incurred.

#### **6.4 Information exchange with other registries**

The programme registry (EcoRegistry) has web services for automatic connections to other registries. The web services use a combination of communication protocols and standards to transfer information between two independent technological platforms.

Through this information exchange, EcoRegistry can expose the information associated with the projects that are registered, their specific characteristics, and the amounts of credits that are certified, transferred, withdrawn, and cancelled. This interface has public consultation options, in which public information on the projects is provided, and has an option that is used when another platform is to be connected. Connections with other platforms must have the indicated confidentiality documentation in place, so that detailed account information, credit balances and end-user information can be shared.

## 7 Project migration from other standards or certification programmes

Projects migration allows projects designed and implemented under other standards or certification programmes to continue their material reduction or recirculation activities under the Voluntary Programme on Circular Economy certification rules after they have been deregistered from the originating standard or programme.

### 7.1 Pre-requisites for the migration process

The requirements for the project to consider when changing from a standard or certification programme to the Voluntary Programme on Circular Economy are as follows:

- That the project must come from circular economy or related standards or certification programmes<sup>5</sup>.
- That the activity of the project to be migrated to the programme is included among the reduction and recirculation activities established in the **Protocol of the Voluntary Programme on Circular Economy**.
- That the elements or processes under which the project was developed are included in the methodologies allowed by the programme.

### 7.2 Requirements for applying for migration

The following are the requirements to apply for migration of a project to the Voluntary Programme on Circular Economy:

- a) Withdrawal of project from the standard or certification scheme from which it originated: project must provide evidence of the withdrawal from the registration of the standard or certification scheme from which it originated. The evidence includes letters of the formal request for the withdrawal of the project from the certification programme and the response generated to this request, the proof of the external transfer of the Circular Credits or their equivalents (including Circular or Plastic Credits), the URL or link of the project registration where it is evidenced that it is currently cancelled, and other supports guaranteeing the cancellation and withdrawal of the project from said standard or certification programme.

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<sup>5</sup> The project should come from circular economy standards or certification programmes that support the market for environmental services related to the reduction (reject, rethink, and reduce) and recirculation (reuse, repair, refurbish, remanufacture, repurpose, and recycling) of materials that pollute the environment today, which should be endorsed by the programme Technical Committee, such as the Plastic Waste Reduction Standard (Verra) and the Circular Credit Mechanism™ (CCM) (Circular Action Hub a BVRio initiative).

- b) Completed **Declaration of Migration from Other Standards or Certification Programmes to Voluntary Programme on Circular Economy** form, available at [www.cercarbono.com](http://www.cercarbono.com).
- c) General and supported information from the project including the items listed in **Table 10** and request for external transfer for the conversion of the Circular Credits (where applicable).

**Table 10.** Information required for the migration from a project to the programme.

Element	Description
Name of the project.	Name of the project as found in the standard or certification scheme from which it originated.
Short description.	Description of the project activity.
Certification standard or programme.	Standard or certification programme where the credits are to be cancelled.
Status of the project.	Active and inactive.
Stage of development of the project.	Formulation, validation, verification, or implementation, as appropriate to the originating standard or programme.
Accreditation period granted.	Day/month/year to what day/month/year.
Renewal of the accreditation period granted.	Describe if granted or scheduled to be granted. If granted, from what day/month/year to what day/month/year.
Verification events.	Number of verification events conducted.
Credits to be reissued.	Total number of credits to be transferred and converted to Circular Credits.
Project link.	Link to the website where the project was registered.
Documents of the project and its audits.	PDD of the project or its equivalent in the source standard.
	Validation, monitoring and verification reports, according to the stage of the project in the original standard or programme.

Once the project has this evidence and the information described in points a), b) and c), it can request its migration by emailing [globalzerowaste@cercarbono.com](mailto:globalzerowaste@cercarbono.com).

### 7.3 Analysis of the accreditation period granted by the standard or certification scheme from which the project originates

Depending on the status of the accreditation period of the project under migration, there are two possibilities:

- The project has an accreditation period in force: in this case, the programme recognises and guarantees compliance with the guidelines and requirements established by the standard or certification programme from which the project originates until the end of the accreditation period.
- The project's accreditation period has been expired for more than a year: the project must apply for the renewal of the accreditation period under the requirements of the programme, as long as the lifespan of the project allows it.

If the project has exceeded its lifespan, its accreditation period cannot be renewed.

### 7.4 Analysis of the standard verification events or certification scheme from which the project originates

Projects that have not performed their verifications on a regular basis should take additional actions, depending on their irregularity.

- Projects with verification delays: if the project has a delay of five or more years in its verification events, it must consider the requirements of section **Deadlines for verification events** of the **Protocol of the Voluntary Programme on Circular Economy**, and its entry is conditional on an analysis. If the project has a delay of less than one year, it can be verified under the programme by an authorised VVB by submitting the required documentation at this stage.
- Project that did not perform verification events: if the project did not perform verification events in the accreditation period granted by the standard or certification programme from which it originates, it must conduct a revalidation justifying the absence of verifications or postulate the project as a new project considering the changes that have been generated in the baseline scenario and in other important elements of the project.

### 7.5 Analysis of the renewal of the project accreditation period

Renewal of the accreditation period in the standard or certification programme from which the project originates:

- In cases where the standard or certification programme has renewed the project's accreditation period and the project has not completed its accreditation period when migrated to the programme, subsequent pending verification events should consider the provisions of section **Deadlines for verification events** of the **Protocol of the Voluntary Programme on Circular Economy**.

- In cases where the standard or certification programme has scheduled or planned the renewal of a project's accreditation period and this has not been generated because the project has not completed its initial accreditation period, the requirements of [Section 7.3](#) should be considered when migrating to the programme.

Renewal of the accreditation period in the programme:

- Once the project has migrated to the programme and demonstrates that it has completed its accreditation period granted in the standard or certification programme from which it originates and still has a lifespan, the programme will be able to renew its accreditation period.
- Once the project has migrated to the programme and demonstrates that it has completed its accreditation period granted in the standard or certification programme from which it originates, but has no lifespan, the programme will not be able to renew its accreditation period.

## 8 Authorisation of validation and verification bodies

This section describes the requirements for VVBs to obtain authorisation to operate under the programme.

The requirements and procedures must be applied and fully complied with by VVBs performing project validation and verification processes.

### 8.1 General requirements

All VVBs authorised by the programme must comply with the requirements described and any other guidelines or requirements defined in the ***Protocol of the Voluntary Programme on Circular Economy***.

The results obtained in the validation and verification processes must be in accordance with ISO/IEC 17029:2019 and ISO 14065:2020.

VVBs must not have any pending legal proceedings for malpractice or fraud at any time.

VVBs must ensure that throughout their authorisation period they will have sufficient resources and technical staff to guarantee the necessary proficiency to perform their operations related to the validation and verification processes.

Final decisions related to the approval, suspension, or cancellation of the authorisation status of VVBs will be always made by the programme technical committee.

### 8.2 Eligibility

VVBs authorised by the programme must be accredited by an International Accreditation Forum (IAF) signatory member accreditation body or other organizations recognized internationally which has in its service offering the Validation or Verification Body accreditation programme for circularity of materials.

Bodies in the process of gaining authorisation may perform a validation or verification process as a witness audit during their accreditation process.

If a VVB has its accreditation cancelled, modified, or not renewed by the above-mentioned bodies, it must immediately notify the programme at [globalzerowaste@cercarbono.com](mailto:globalzerowaste@cercarbono.com). The VVB must provide all the information related to the projects with which it is currently involved; in the case of projects that have pending validation or verification processes, the technical committee of the programme will decide on any additional conditions or actions required.

The programme will have a record of the accreditation dates of each of the programme's authorised VVBs. The authorised VVBs are obliged to provide the programme with updated accreditation information, as well as the list of auditors. In the case of evidence of expiry without renewal of accreditations or the performance of a process with an unauthorised technician, the authorisation of the VVB will be suspended.

### 8.3 Need for change in VVBs

In order to ensure the transparency of the validation and verification processes, as well as to prevent situations generating conflicts of interest, it is necessary that the VVB attending the validation and subsequent verifications is changed after two of these consecutive events.

In cases where it can be demonstrated that the project has no other authorised VVB option to perform the verification, it will not be necessary to change the VVB after having performed a second consecutive verification.

### 8.4 Authorisation process

VVBs authorised by the programme must comply with the steps described below.

#### 8.4.1 Submitting an application

The representative of the VVB must send an email to [globalzerowaste@cercarbono.com](mailto:globalzerowaste@cercarbono.com) with the subject "Application for VVB approval", in which they must attach the following supports or documents:

- **Application for Accreditation as a Validation and Verification Body** form, available at [www.cercarbono.com](http://www.cercarbono.com).
- Documentary evidence referenced in section B of the above-mentioned form. This evidence must be clear, specifying the activity or activities considered by the programme to be within the scope of the authorisation held by the VVB.

#### 8.4.2 Review of the information

The programme generates a response to the VVB representative confirming receipt of the information and subsequently initiates the study of the documents submitted by the VVB and verifies the completeness of the same. The technical team reviews the documentation, notifies the VVB if it is incomplete and suspends the process until it is completed.

The duration of this stage is three to four business days, as long as the documentation is complete. Otherwise, the time is extended until completion.

### 8.4.3 Assessment of implementation

Once the technical team has verified that the documentation for the application is complete, the assessment of the application starts with a notification to the management of the programme.

The duration of this stage is approximately thirty (30) days, as long as the executives do not make additional requests to the agency. Otherwise, the time is extended until these requests are attended to by the VVB.

Once the assessment is completed, the programme will communicate to the VVB the decision made by the executives on the approval or rejection of the application.

### 8.4.4 Signing of agreement

If the application is approved, a collaboration agreement is signed, formalising the relationship between the VVB and the programme.

### 8.4.5 Account creation on the registration platform

VVBs that are approved by the programme must have an account on the EcoRegistry platform to perform the validation and verification processes.

## 8.5 Status of VVBs

A list of authorised VVBs, their accreditation period and status can be found at [www.cercarbono.com](http://www.cercarbono.com):

- **Active:** when the VVB has updated its accreditation supports and has no non-compliance faults that have not been duly resolved.
- **Inactive:** in cases where the VVB does not renew the documentation, but it has not been suspended.
- **Suspended:** in cases where the programme identified a persistent inconsistency regarding the validity of the accreditation or technical equipment or failures within the validation or verification processes that have not been resolved according to the programme guidelines.

## 8.6 Project processes

- The project chooses the VVB with which it is to perform the validation and verification processes based on the list of VVBs authorised by the programme. The project must verify that it is within the scope of accreditation of the selected VVB.
- Before initiating the processes, it is necessary for the project holder or developer to be familiar with the validation and verification plan of the VVB, which specifies the requirements for sampling, field visits, internal and external data audits, among others.



- During the validation and verification of the project, it is necessary to ensure compliance with this section, as the contractual relationship between the holder or developer and the VVB is direct and the decision on the selection of the VVB rests solely with the holder of the project.
- The project must identify whether the dates on which the validation or verification processes are to be conducted are within the timeframe covered by the accreditation of the VVB.
- The project should change the VVB after the second verification event to ensure compliance with the principle of transparency.

## 8.7 Confirmation of Validation and Verification Body Team

The knowledge and composition requirements for audit teams conducting validation and verification processes in the programme are described below, with the understanding that the VVBs must ensure compliance with these requirements.

The VVB must have specialised personnel in the materials circularity: one person who is the validator or verifier and one person who fulfils the functions of an expert technical reviewer. The programme allows personnel to be directly linked to the company or external individuals to be appointed, as long as they have some contractual link between the parties. In the case of external validators or verifiers, the VVB assumes full responsibility for the work performed.

The skills and capacities that VVBs must have in order to perform activities under the programme are listed below:

### **Capacities needed in the methodological content audit:**

- Understanding of the certification programme guidelines.
- Selected methodologies and establishment of the baseline scenario.
- Assessment of additionality.
- Quantification of material reduction or recirculation.
- Monitoring system.
- Assessment of legal compliance and environmental and social requirements.

### **Capacities needed in the measurements audit:**

- Data collection through different means.
- Verification of accuracy and veracity of collected data.
- Data and systems audit procedures and techniques.
- Risk analysis procedures and techniques.

## 8.8 VVB non-compliance

The technical management of the programme supervises the performance of the authorised VVBs by reviewing the completeness of the documents and procedures

developed by the VVBs in order to verify compliance with the requirements established by the programme.

The procedures to be followed with the VVBs in case of non-compliance or inconsistencies are defined according to the seriousness of the non-compliance and the repetition of this, as shown in [Table 11](#).

**Table 11.** Management of VVBs non-compliance and inconsistencies.

Fault or infringement	Occurrence	Sanction
Intentionally providing false information.	First time	Written notification and request for clarification of the information. During the process, the VVB may no longer carry out validations or verifications.
	Second time	Indefinite suspension and sanction of the VVB's authorisation, disqualifying it from conducting validations and verifications under the programme.
Incursion of conflict of interest.	First time	Written notification and request for clarification of information and reporting of corrective measures.
	Second time	Sanction of VVB's authorisation, disqualifying it from conducting validations and verifications under the programme.
Persistent underperformance.	First time	Written or verbal notification of the inconsistencies presented. The VVB must present a plan aimed at avoiding the occurrence of the issues detected.
	Second time	Indefinite suspension of the VVB's authorisation, disqualifying it from carrying out validations and verifications under the programme.
Lack of monitoring on the findings in validation or verification processes.	First time	The error or omission is communicated, and correction is requested. Request for review of internal processes to prevent this type of misconduct.
	Second time	Indefinite suspension of the VVB's authorisation, disqualifying it from conducting validations and verifications under the programme.

## 9 Procedures and articulation between the Programme and EcoRegistry

In all relevant aspects, the principles and standards established in the **Protocol of the Voluntary Programme on Circular Economy**, and the procedures defined in this document are mandatory for EcoRegistry.

The Programme and EcoRegistry hold frequent coordination meetings and maintain permanent contact, through the participation of members of both teams in different internal communication channels of each institution, in order to ensure coherence and cohesion in the processes required for the issuance of the Circular Credits.

# Legal Procedures



## 10 Confidentiality

In order to guarantee the confidentiality of the documents supporting the certification and of any information that, due to the certification, becomes known to the staff or delegates of Global Zero Waste and Cercarbono, EcoRegistry, the VVBs and consultants performing the audits or certifications and which are not of a public nature, the aforementioned staff must sign annually (or when assigned, in the case of temporary or specific staff) a confidentiality agreement.

The procedure for the management and control of the information deposited in the registration platform is defined in the **EcoRegistry User Guide Registry Platform**, available at [www.ecoregistry.io/documents](http://www.ecoregistry.io/documents), which must be followed by EcoRegistry, Cercarbono, Global Zero Waste and other personnel assigned to certification processes. This manual also includes a section on confidentiality of information and a mechanism for monitoring and quality control of the content of the documents in each account.

**Table 12** identifies the documents that are part of the regular programme certification process and their confidentiality.

**Table 12.** Confidentiality of project information in the register.

Document	Format	Type of information
Location of the project	jpg/png	Public
Programme change declaration (if applicable)	pdf	Public
Previous documentation (if applicable)	pdf	Mixed
Project description document	pdf	Public
Summary of the project <sup>6</sup>	pdf	Public
Supporting documents	pdf	Private
Power of attorney	pdf	Private
Validation calculations	xlsx	Private
Validator's conflict of interest statement	pdf	Public
Validation report and appendices	pdf	Public
Validation statement	pdf	Public
Monitoring report	pdf/xlsx	Public

<sup>6</sup> In case the PDD has not been submitted in English, the project shall submit a summary in English.

Document	Format	Type of information
Verification calculations	xlsx	Private
SDGs' tool and evidence	pdf/xlsx	Public
SDGs rubric	pdf	Public
Verifier's conflict of interest statement	pdf	Public
Verification report and appendices	pdf	Public
Verification statement	pdf	Public
Issuance certificate	pdf	Public
Certification report	pdf	Public
Project notes	pdf	Private
Withdrawal certificates	pdf	Public

## 11 Conflict of interest

The programme seeks to ensure that the outcome of the service it offers is not improperly affected by factors external to the certification process, and therefore establishes procedures to understand, identify, and appropriately manage conflicts of interest that may arise.

The principles and procedures described are useful for directors and employees of Global Zero Waste and Cercarbono, registry administrators, as well as third parties, to identify situations that may represent a conflict of interest, directly or indirectly affecting the interests of the parties involved in the provision of the certification service offered by the programme.

The regulations specified are mandatory for directors, employees, validation, and verification bodies, project developers, registry platform, external consultants and all those involved in the certification and registration process of the materials reduction or recirculation projects.

### 11.1 Situations of conflict of interest

The following are some situations or actions that lead to conflicts of interest.

#### 11.1.1 Use of confidential information

Information and documentation related to the projects certification activity and potential business must be handled within the organisation and may not be used for personal gain or for the benefit of a third party.

Misuse of confidential company information occurs when any of the following actions are taken:

- Information is published without prior authorisation.
- Using or concealing company information for personal gain or for the benefit of a third party.
- Providing information to persons who are not authorised to have it.

#### 11.1.2 Business activities and shareholdings in companies

Related conflicts of interest occur in cases where any employee or director has a direct (as a legal representative, partner, employee, or executive) or indirect (as a consultant) involvement in a supplier company that is directly related to Global Zero Waste and Cercarbono.

#### 11.1.3 External employment and investment

Global Zero Waste and Cercarbono employees must not work for a company that has the same corporate name; nor should they serve on boards of directors or be

consultants to companies that are direct competitors, regardless of whether or not remuneration is received.

Investments outside the company that represent an economic interest likely to influence the judgement of employees are considered a conflict of interest.

#### 11.1.4 Economic activities of persons close to those involved

If any director, employee, supplier, or consultant identifies that in one of the companies with which the programme has business or plans to have business, there is a relationship with a person with whom there is a degree of kinship, it should be reported and declared if it is related with the work performed in the programme.

#### 11.1.5 Corporate opportunities

An employee, external consultant or director cannot personally take advantage of an opportunity generated in the process of performing their work in the programme.

### 11.2 Management of conflicts of interest

Programme expects all employees to report and declare, both during the hiring process and subsequently, any identified conflicts of interest. Zero Waste Global and Cercarbono directors are responsible for managing these when they arise and for identifying potential conflicts.

#### 11.2.1 Procedures for managing conflicts of interest

If a conflict of interest is identified in Global Zero Waste or Cercarbono, the due process is as follows:

- When a conflict of interest is identified, all actions and direct or indirect involvement in the actions of the person involved must be suspended until it is determined that there is no conflict of interest.
- Inform the immediate superior in a timely manner and as soon as possible, by submitting the **General Declaration of Conflict of Interest** form, which can be found at [www.cercarbono.com](http://www.cercarbono.com).
- Provide all the necessary information and documentation to enable the superior and subsequently the directors of Global Zero Waste and Cercarbono to understand the matter in detail.
- The directors of Global Zero Waste and Cercarbono decide whether or not a conflict of interest exists.
- If a conflict of interest does exist, the directors of Global Zero Waste and Cercarbono indicate the actions to be taken in a document, as well as inform the person appointed to assess the case.

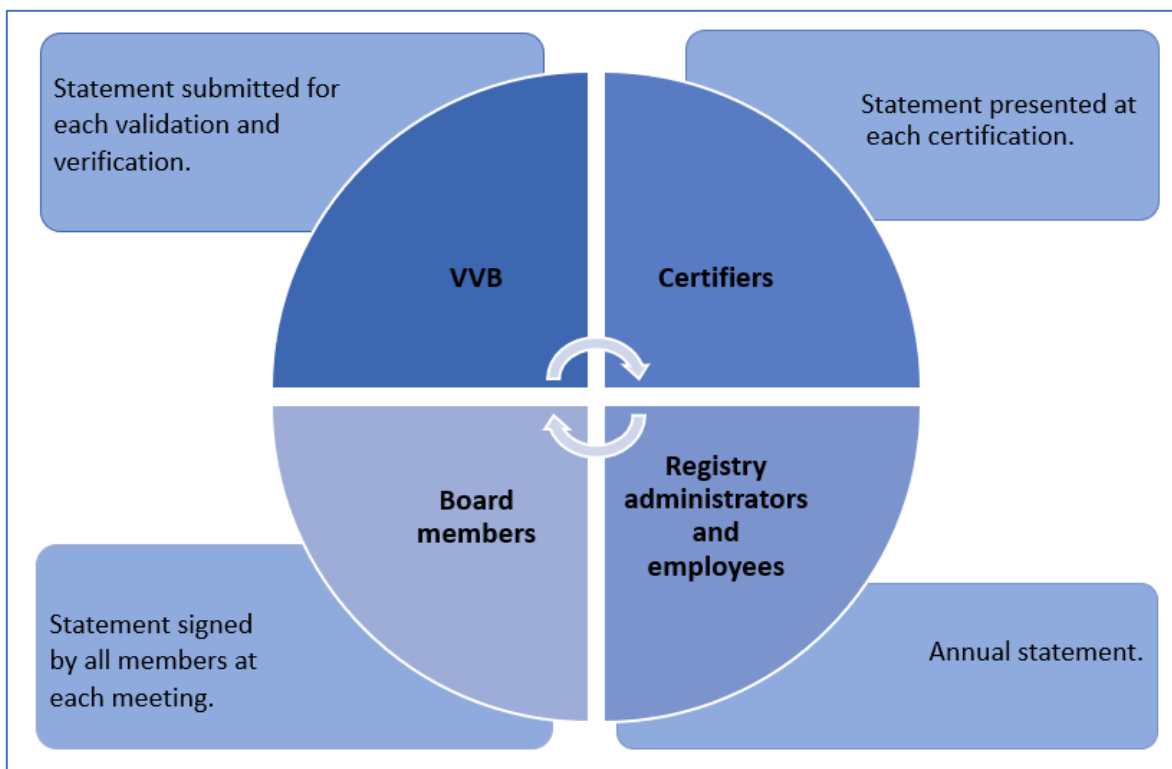


- There should be written evidence of the notification and management of the conflict, by the person involved and the directors of Global Zero Waste and Cercarbono.
- If it is concluded that the person involved is presenting a permanent conflict of interest which constantly affects the exercise of their functions, it should be analysed whether the conflict is a cause for termination of contract, due to the impossibility to exercise the position.

### **11.2.2 Management of conflicts of interest related to stakeholders**

In the programme certification process, there are several actors involved and as part of the process of prevention and management of possible conflicts of interest that may arise, the following procedures are followed with each of these actors where a declaration of conflict of interest is requested, depending on the activity that each one performs, as shown in [Figure 5](#).

**Figure 5.** Actors required to file conflict of interest declarations.



### 11.3 Mechanisms for reporting conflicts of interest

If a staff member encounters a conflict of interest in the performance of their duties, directly or indirectly, they must immediately inform their line manager by sending an email describing the situation and attach the programme **General Declaration of Conflict of Interest** form.

The person receiving this report must notify the directors of Global Zero Waste and Cercarbono to initiate the process. Members should consider different alternatives with their respective consequences and analyse previous experiences to find the solution that ensures fairness and transparency.

### 11.4 Prevention of conflicts of interest

All employees, suppliers and consultants must comply with all decisions and actions taken by the directors of Global Zero Waste and Cercarbono, as well as with what has been agreed and signed in the employment contract.

Persons who are part of the company's shareholding composition shall not take advantage of the company's business opportunities for their own benefit or for the benefit of third parties. Membership on boards of directors or similar activities is acceptable only to the extent that such activities do not interfere with their work in the company.

All applicants for employment with the Company must agree that they have read and understood the principles and procedures established in this section at the time of their engagement and must complete the **General Declaration of Conflict of Interest** form.

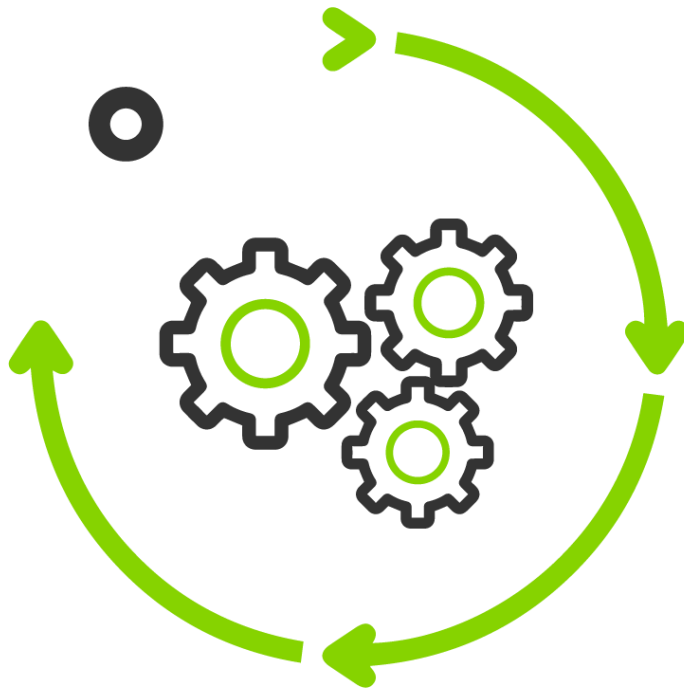
All persons involved in the company should report, through regular channels of communication, their suspicions of possible conflicts of interest if something demonstrable has been evidenced.

### **11.5 Conflicts of interest related to VVBs**

All VVBs should have procedures within their internal policies to ensure that persons involved in the validation and verification processes, senior management or board members or partners do not have financial, commercial, or functional conflicts of interest in the provision of the service. Similarly, they should have procedures in place to ensure that, where such conflicts arise, they are declared and adequately addressed.

VVBs must submit a conflict of interest declaration for validation and a conflict of interest declaration for verification of the projects as a prerequisite for the programme. The form for this declaration can be found at [www.cercarbono.com](http://www.cercarbono.com). The declaration of conflict of interest for validation or verification must be dated eight calendar days prior to a validation or verification event.

## Technical Procedures



## 12 Approval of methodologies in the framework of the programme

If there is no approved methodology applicable to a given project in the programme, a new one can be proposed or a revision of an already approved methodology can be requested. Principally, the new methodology option should be pursued if a project activity requires substantially different methodological approaches from an approved methodology.

This section establishes the process by which new or existing methodologies in other standards or certification schemes are approved for implementation by the Voluntary Programme on Circular Economy.

### 12.1 Technical committee

The methodology approval process is conducted by an ad hoc technical committee, which is appointed in each case by the directors of Global Zero Waste and Cercarbono and is composed of at least two people, who may be technical personnel from Cercarbono, Global Zero Waste or consultants with expertise in the type of material to which the methodologies correspond.

The participants of the committee must have the following characteristics:

- Have knowledge of the principles and guidelines governing the programme, especially those presented in its protocol.
- Have experience in the type of material and core area in which the methodology is developed.
- Be able to guarantee that none of their work, professional or personal activities represent a conflict of interest.

### 12.2 Approval process

The approval process depends on the type of methodology under consideration, which may be proprietary to the standard or programme, developed by third parties and already subject to public consultation, or new, developed by third parties but not yet subject to public consultation.

The process described only applies to new methodologies developed by third parties or existing methodologies belonging to other standards or programmes, and comprises the stages described below. For the approval of programme's own methodologies, the steps described in [Sections 12.2.4](#) and [12.2.5](#) shall be followed.

### 12.2.1 Application for approval

The proposer of the methodology must complete the form ***Application for Approval of New Methodology or Methodology from Another Standard or Certification Programme***, available at [www.cercarbono.com](http://www.cercarbono.com) and send it to [globalzerowaste@cercarbono.com](mailto:globalzerowaste@cercarbono.com) with the subject “Application for approval of methodology”. In the case of methodologies that have been published under another standard or programme, written and duly legalised authorisation must be attached on behalf of the institution that owns the commercial rights (or, failing this, on behalf of the author) for the use of the methodology by the Voluntary Programme on Circular Economy and the incorporation of its logo in the place or places in which it corresponds.

Once the application has been studied, the programme informs the proposer if the methodology is relevant to the programme; if so, the methodology approval process can continue.

### 12.2.2 Submission of methodologies

#### 12.2.2.1 Methodologies that have not been subject to public consultation

The methodology draft can be written in English or Spanish and must be submitted in Microsoft Word format and optionally, if necessary, with files in Microsoft Excel format. If the methodology includes tables integrated in the document, these must also be submitted in Microsoft Excel format. If the methodology includes graphs, these must be submitted in editable formats. The proposer of a new methodology may request a template in Microsoft Word format for editing.

The methodology should be sent to [globalzerowaste@cercarbono.com](mailto:globalzerowaste@cercarbono.com) with subject “Methodology without public consultation” and should include the following elements:

- Name of the methodology.
- Names of the persons or company in charge of the development of the methodology.
- Definitions and specific terms of the methodology that are not included in the ***Terms and Definitions of the Voluntary Programme on Circular Economy*** and that are relevant for the understanding of the methodology.
- Accreditation period, where applicable.
- Monitoring parameters and frequency of measurement.
- Baseline scenario.
- Project activity.
- Project scenario.
- Other considerations and constraints.

### 12.2.2.2 Methodologies that have already been subject to public consultation

The proposer must attach the current version of the methodology in an editable format, preferably in Microsoft Word format, and the link where it is published, and must send it to [globalzerowaste@cercarbono.com](mailto:globalzerowaste@cercarbono.com) with the subject “Methodology with public consultation”.

### 12.2.3 Assessment of methodologies

In this stage, the relevance, pertinence, and suitability of the methodologies are analysed, as well as their conformity with the principles of the programme, its technical bases and concepts, and its terminology, according to the criteria defined in **Table 13**. Four possible outcomes are obtained from the application of these criteria:

**Approved** implies the fulfilment, without exception, of all evaluation criteria by a methodology that has already been taken to public consultation and has taken into account the contributions of the public.

**Approved for public consultation** implies compliance, without exception, with all assessment criteria, which qualifies it for public consultation.

**Approved with request for modifications** implies non-compliance with at least one of the evaluation criteria.

**Rejected** implies non-compliance with at least one of the evaluation criteria on aspects that are difficult to remedy or incompatibility with the principles of the *Protocol of the Voluntary Programme on Circular Economy* and other general provisions of the programme or considers questionable legal, ethical, or commercial aspects.

The results of the evaluation are recorded in a report signed by the technical committee and communicated to the proposer.

**Table 13.** Assessment points of proposed methodologies.

Element	Compliance		
	Yes	No	Requires adjustments
Is eligible within the material type scope of the programme.			
Is fully compatible with the principles of the protocol and other general provisions of the programme.			

Element	Compliance		
	Yes	No	Requires adjustments
It is fundamentally different from the methodologies approved by the programme.			
The terms used are consistent with the most recent version of the <i>Terms and Definitions of the Voluntary Programme on Circular Economy</i> , available at <a href="http://www.cercarbono.com">www.cercarbono.com</a> .			
Complies with the most recent version of the <i>Tool to Report Contributions of Circular Economy Initiatives to the Sustainable Development Goals</i> , available at <a href="http://www.cercarbono.com">www.cercarbono.com</a> .			
Complies with the <i>Protocol of the Voluntary Programme on Circular Economy</i> for determining the baseline scenario.			
Complies with the <i>Protocol of the Voluntary Programme on Circular Economy</i> for determining the project scenario.			
Complies with the <i>Protocol of the Voluntary Programme on Circular Economy</i> for determining the quantification of materials reductions and recirculation.			

### 12.2.3.1 Methodologies that have been subject to public consultation

Methodologies developed under other standards or programmes that have already had a public consultation are only given an approved or rejected rating.

Those that are **approved** directly by the committee may be published on the Cercarbono website for use.

**Rejected** methodologies are not considered in their current versions for use under the programme. New versions of these, with substantial changes to address



elements that are not compatible with the programme, may be submitted to the approval process.

### 12.2.3.2 Methodologies that have not been subject to public consultation

For methodologies developed under other standards or certification schemes or by third parties that have not had a public consultation, the steps to be taken depend on the results of the preliminary assessment.

Methodologies **approved for public consultation** may be subject to public consultation, as established in the programme's protocol.

Proposers of **approved methodologies with application for modifications** receive a detailed written assessment outlining the modifications or improvements required for acceptance into the programme. Members of the technical committee and the proposers can hold discussion meetings in which the elements and reasons for rejection are presented and possible solutions can be discussed.

Proposers may submit modified versions of the methodologies for evaluation, when they consider that all applications for modifications have been duly addressed. The programme may assign the same technical committees that previously evaluated them or define a different composition, depending on the circumstances.

This cycle can be repeated until an **approved** result is obtained or until the proposer withdraws.

The proposers of the **rejected** methodologies receive a detailed written diagnosis defining the elements that make them incompatible with the programme. These methodologies can be modified for re-proposal by submitting a list of the substantial changes made. The programme may assign the same technical committees that assessed them previously or define a different composition, depending on the circumstances. If the same methodology is rejected twice, it cannot be resubmitted to the approval process under the programme.

### 12.2.4 Review of methodology

The programme technical committee conducts an in-depth review of the proposed methodology in a period of approximately twenty calendar days, depending on its complexity. If necessary, comments and suggestions are sent to those in charge of developing the methodology, who must respond within 15 calendar days, in order to continue with the approval process.

### 12.2.5 Public consultation

After the final version of the methodology has been defined and all actions and observations have been implemented, a public consultation is held for stakeholders for a period of thirty calendar days.

The public consultation is held through the Cercarbono website in order to have control over the comments received and the persons or companies to which these comments correspond.

At the end of the time the comments are received, they are forwarded to the proposer of the methodology, who ensures that they are duly incorporated or, if they are not considered relevant, demonstrates their irrelevance.

Once all the comments from the public consultation have been processed, the proposer must provide the programme with an adjusted version of the methodology, with the comments received in the public consultation incorporated as comments in the margin where appropriate and with the changes made in change control, as well as a clean adjusted version, without comments or editing marks, which is reviewed for approval or non-approval.

The proposer must also submit a table of responses to comments from the public consultation, for publication on the Cercarbono website.

All versions of the proposed methodologies (initial, adjusted with comments and edits, adjusted and clean), accompanying documents, assessment diagnostics and reports are duly archived by the programme to ensure transparency and traceability of the approval process.

### **12.3 Copyrights, trademarks, brands, and logos**

In all cases, the programme acknowledges and makes explicit the copyrights of the approved methodologies.

In all cases, the programme respects and preserves in the published materials (existing methodologies from other standards or programmes) the existing marks and logos on them.

In the case of methodologies that are submitted to the programme approval process and that have not been submitted for public consultation, the programme reserves the right to add its own logo in the usual places in its methodologies but respects the right to use the logos of the institutions involved in their development.

In the case of methodologies developed partially or totally by third parties, the programme recognises the corresponding royalties for their use by clients.

## 13 Request for methodological review, deviation, or clarification

If a project requires a methodological deviation from the selected methodology, the following must be submitted:

- Description of the mandatory requirement from which the deviation is requested, including reference to the specific section of the methodology where the requirement is described.
- Justification for requesting the deviation.
- Proposed methodological alternative.
- Proposal to implement the deviation, including its implementation date.
- Assessment and description of the impact of the deviation on reduction or recirculation of project materials.

The deviation is requested through the registration platform, EcoRegistry. This is assessed during the formulation stage and based on the rationale presented, the programme determines whether it is approved or not. If approved, the OVV is responsible for the detailed assessment and validation of the deviation.

If a project developer or, in general, an independent third party considers that an approved methodology can be adapted to apply to specific conditions of a project, it can propose a revision of the methodology to the programme. Depending on the extent and scope of the revision, a technical committee defined by the programme will define which of the steps established for the approval of new methodologies will be applicable for the approval of the revision.

## 14 Guidelines for remote audits and audit deferral

This section is addressed to projects and VVBs involved in certification of circular materials under the programme. It is applicable to all activities covered by the ***Protocol of the Voluntary Programme on Circular Economy***. Projects contemplating remote audits can only be certified by the programme if they demonstrate compliance with these guidelines.

In special circumstances, there may be situations where on-site audits are not feasible and remote audits may be required.

In cases where a project is faced with an extraordinary situation that enables a remote audit and does not wish to postpone it, it must submit a request (by letter or mail) to the programme requesting authorisation for such a remote audit and the circumstances that enable it.

The circumstances necessary to enable remote auditing are listed below (all must be fulfilled):

- There is an extraordinary situation that implies an impediment to conduct the audit in the field or site visit in a face-to-face manner in accordance with the ***Protocol of the Voluntary Programme on Circular Economy***.
- The remote audit is conducted in the framework of a verification event.
- It has a positive opinion and a previously issued validation and verification statement<sup>7</sup>.
- There is an agreement between the project and the VVB ensuring that the infrastructure is in place to conduct a remote audit and specifying the conditions to safeguard the security and confidentiality of the information<sup>8</sup> (including that of the previous verification event).
- The project has the necessary records or documents (including electronic information), as well as the availability to collaborate with the remote audit, so that the remote audit can be performed under a reasonable level of assurance.
- The risk level of the verification event is low.
- It has a declaration of conflict of interest between the project holder or developer and the VVB to perform the remote audit (stating the justification for implementing it in this way) within a reasonable timeframe.

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<sup>7</sup> The first verification of a project must be conducted in person.

<sup>8</sup> Such as files, photographs, documents, reports, procedures, among others, to be verified. Some or all of this information may need to be sent to the VVB for review prior to the remote audit, which should be included in the verification plan.

## 15 References

Cercarbono. (2024a). *Cercarbono's Protocol for Voluntary Carbon Certification*. Version 4.4. Available at: [www.cercarbono.com](http://www.cercarbono.com).

Cercarbono. (2024b). *Procedures of Cercarbono's Certification Programme*. Version 2.2. Available at: [www.cercarbono.com](http://www.cercarbono.com).

EcoRegistry. (2023). *EcoRegistry User Guide Registry Platform*. Version 2.0. Available at: [www.ecoregistry.io/documents](http://www.ecoregistry.io/documents).

Global Zero Waste and Cercarbono. (2025a). *Protocol of the Voluntary Programme on Circular Economy*. Version 2.0. Available at: [www.cercarbono.com](http://www.cercarbono.com).

Global Zero Waste and Cercarbono. (2025b). *Terms and Definitions of the Voluntary Programme on Circular Economy*. Version 2.0. Available at: [www.cercarbono.com](http://www.cercarbono.com).

Global Zero Waste and Cercarbono. (2025c). *Tool to Report Contributions of Circular Economy Initiatives to the Sustainable Development Goals*. Version 2.0. Available at: [www.cercarbono.com](http://www.cercarbono.com).

ISO 14065:2020. *General principles and requirements for bodies validating and verifying environmental information*.

ISO 59004:2024. *Circular economy: Vocabulary, principles and guidance for implementation*.

ISO 59010:2024. *Circular economy: Guidance on the transition of business models and value networks*.

ISO 59020:2024. *Circular economy: Measuring and assessing circularity performance*.

ISO/IEC 17029:2019. *Conformity assessment - General principles and requirements for validation and verification bodies*.

## 16 History of the document

Version	Date	Comments or changes
1.0	17.04.2023	Initial version of the document.
2.0	04.03.2025	Version aligned to the ISO Circular Economy Standards: ISO 59004:2024, ISO 59010:2024 and ISO 59020:2024. Replacement of the acronyms VPCE, PCEM and CEC by their full names. Change Global Zero Waste logo.

## 17 Annex

### Clarification of documentation for developers, licensees and VVBs

In order to facilitate the management of the projects, Global Zero Waste and Cercarbono have established the documents and templates presented below:

#### Regulatory documents

Document
Protocol of the Voluntary Programme on Circular Economy for the certification of projects.
Procedures of the Voluntary Programme on Circular Economy.
Terms and Definitions of the Voluntary Programme on Circular Economy.

#### Requirements for the development of the project

Pre-registration and formulation
Application for Renewal of Accreditation Period.
Application for Approval of New Methodology or Methodology from Another Standard or Certification Programme.
Project Description Document.
Power of Attorney.
Application for Conversion of Circular Credits (or related) from Other Standards or Programmes to programme.
Request for Methodological Deviation.
General Declaration of Conflict of Interest.
Declaration of Migration from Other Standards or Certification Programmes to Voluntary Programme on Circular Economy.
Change of Organization Name Declaration Form.
Project Transfer Declaration Form.

Implementation
Monitoring Report.

Validation and verification
Application for Accreditation as a Validation and Verification Body.
Declaration of Conflict of Interest Made by the VVB.
Validation Report.
Joint Validation and Verification Report.

<b>Validation and verification</b>
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Verification Report.
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Validation Statement.
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Joint Validation and Verification Statement.
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Validation Statement.
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## Tools

<b>Tools</b>
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Tool to Report Contributions of projects to the Sustainable Development Goals.
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All these documents are available at [www.cercarbono.com](http://www.cercarbono.com).