



GENERAL CONDITIONS: VERIFICATION/VALIDATION PROCESS

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This document describes the verification/*validation* activities provided by COSMOCERT, concerning ISO 14064-1 & ISO 14064-2.

1. Verification/*Validation* description

1.1 Application (pre-engagement) and Review of application

The first step is to gather the necessary information from the applicant. This includes the following:

- Environmental Information Statement/Claim
- Verification/*Validation* objectives
- Standard or program
- Scope and boundary
- The level of assurance and materiality (see explanation below)
- The results of sensitivity & uncertainty analysis.

This data is the input for the Application Review.

After the application review stage, a financial proposal is prepared and, if accepted by the client, the Contract (engagement) is prepared for signature by the applicant. In addition, the client will be required to provide the following to the Verification/*Validation* Body:

- Environmental Information Report (EIR)/ GHG Report (*mandatory*)
- Quantification Methodologies (including data selection and collection, selection or development of GHG quantification model) (*mandatory*)
- Calculation GHG emissions and its result (*mandatory*)
- A base-year review and recalculation procedures, *if available*
- GHG Baseline Scenario Selection Process
- GHG Baseline methodology
- GHG reduction initiatives implemented at the organization, if implemented
- GHG Information management procedures (*available on-site*)
- Document retention and record keeping procedures (*available on-site*)
- Procedure of process and criteria that define significant indirect emissions (*available on-site*).
- GHG Data Flow, *if available*.
- Emission Monitoring Plan (EMP), *if available*.
- Previous Verification Report, if available.



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1.2 Planning

COSMOCERT selects competent personnel and establishes plans to reduce the risk of material misstatement of the statement or claim.

Clients must provide sufficient information for COSMOCERT to plan effectively, and a reasonable level of assurance requires more extensive verification/validation activities.

1.2.1 Strategic Analysis / Risk Analysis

After signing the contract and assigning the responsible personnel, a strategic analysis is performed (pre-verification/*validation*). In this stage, the results of the application review are taken into account (input).

In case of verification, the strategic analysis is always followed by a risk analysis (both stages are pre-verification/*validation*). The risk analysis is evaluated throughout the verification/*validation* process, particularly in response to evidence gathered and verification/*validation* findings.

1.3 Verification/*Validation* Plan / Sampling Plan / Evidence gathering plan/ Verification/*Validation* activities (execution)

Both validator & verifier shall design evidence-gathering activities to collect sufficient and appropriate evidence for each characteristic of the GHG-related activity to support his/her conclusion.

For validation activities, except in cases where the validator chooses to examine all evidence, the validator shall use a risk-based process to identify evidence to be collected for each characteristic of the GHG-related activity. The validator shall use any validation activities or techniques in designing the evidence-gathering plan including site visits.

For verification activities the evidence-gathering plan shall be based on the results of the verifier's risk assessment. It shall be designed to lower the verification risk to an acceptable level.

The evidence-gathering plan shall specify the type and extent of evidence-gathering activities and shall not be communicated to the client or responsible party.

A draft verification/*validation* plan is prepared by the team leader and communicated to the client prior to verification/*validation*. The verification/*validation* plan describes the verification/*validation* activities and schedules. The verification/*validation* plan is revised as necessary during the verification/*validation* activity.

The verification/*validation* plan follows the strategic analysis and risk analysis (for verification) and consists of the verification/*validation* schedule, a test plan and a data sampling plan.



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The verifier/validator shall conduct the verification/validation according to the verification/validation plan and the evidence-gathering activities according to the evidence-gathering plan.

The verification/*validation* activities performed on-site at this stage are as follows: data verification/*validation*, analytical procedures, verification/*validation* of the correct application of the monitoring methodology, verification/validation of data flow, verification/validation of the implementation and effectiveness of control activities, verification/validation of procedures. Data verification/validation includes verification/validation of raw data, factors used, accuracy of methods, measurements, calculated results, etc.

The team, which may be one person, will carry out the activities identified in the plan, which specifies where and how they will be carried out.

COSMOCERT performs the verifications on-site under §6.1.4 and validations under §7.2 of ISO 14064-3.

Whenever the responsible party makes changes to the GHG statement as a result of requests for clarification, misstatements and nonconformities, the verifier shall assess these changes.

1.3.1 Verification/*Validation* report and verification opinion/statement / Misstatements, non-conformities and OFI

The validator shall use his/her assessment and evaluations, and the evidence gathered to assess the responsible party's GHG statement against validation criteria. The validator shall assess, individually and in the aggregate, whether uncorrected misstatements are material to the GHG Statement. The validator shall assess conformity with the criteria and re-assess recognition.

Based on the findings, the team will determine whether there are any misstatements or nonconformities with the statement/claim. These may need to be closed in order for a positive opinion to be issued, particularly if they are found to be material.

Any misstatements identified may require additional activities.

More specifically, when the verification/*validation* is complete, the verification/*validation* team arrives at a location provided by the company and after collecting the audit findings, prepares and completes the verification/*validation* report and reports any misstatements, non-conformities, OFI. The verification/*validation* opinion/statement is the summary of the entire verification/*validation* report and states the verifier's/*validator's* overall opinion of the reported data. There are four different types of verification/*validation* opinions:

- a. Unmodified opinion
- b. Modified opinion



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- c. Adverse opinion
- d. Disclaiming the issuance of an opinion

The verification/*validation* statement is included (attached to a separate document) in the verification/*validation* report.

If the verifier/*validator* identifies any misstatements or nonconformities during the verification/*validation*, the verifier/*validator* will notify the company in a timely manner and request appropriate corrections. In order to draft an unmodified opinion, the verification team shall ensure that:

- a) there is sufficient and appropriate evidence to support material emissions, removals or storage;
- b) the criteria are applied appropriately for material emissions, removals or storage;
- c) the effectiveness of controls has been evaluated when the verifier/*validator* intends to rely on those controls.

In order to draft an unmodified opinion, the validator shall ensure:

- a) there is sufficient and appropriate evidence to support the future estimate;
- b) the criteria meet the needs of the intended user;
- c) the criteria are appropriately applied for material emissions, removals or storage.

In order to draft a modified opinion, the verification/*validation* team shall ensure that there is no material misstatement at the level of the EIGHG statement. When there is a departure from the requirements of the criteria or a scope limitation, the verifier shall decide what type of modification to the verification opinion is appropriate. In addition to materiality, the verifier shall consider:

- ✓ the degree to which the matter impairs the usefulness of the GHG statement;
- ✓ the extent to which the effects of the matter on the GHG statement can be determined;
- ✓ whether the GHG statement is, or could be understood to be, misleading even when read in conjunction with the verifier's opinion.

A modified verification opinion, when read in conjunction with the GHG statement, normally will serve adequately to inform the intended user(s) of any deficiencies or possible deficiencies in the GHG statement. In this case, the non-material misstatement shall be:

- a) confined to specific elements, classifications or line items of the GHG statement;
- b) even if confined, not representative of a substantial portion of the GHG statement;
- c) not fundamental to the intended user's understanding of the GHG statement.



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In order to draft a modified opinion, the validator shall ensure that there is no material misstatement at the level of the GHG statement.

When there is a departure from the requirements of the criteria or deficiencies in the assumptions used to develop future estimates, the validator shall decide what type of modification to the validation opinion is appropriate.

In addition to materiality, the validator shall consider:

- the degree to which the matter impairs the usefulness of the GHG statement;
- the extent to which the effects of the matter on the GHG statement can be determined;
- whether the GHG statement is, or could be understood to be, misleading even when read in conjunction with the validator's opinion.

A modified validation opinion, when read in conjunction with the GHG statement, normally will serve adequately to inform the intended user(s) of any deficiencies or possible deficiencies in the GHG statement.

In order to draft an adverse opinion, the verification team shall conclude that:

- a) there is insufficient or inappropriate evidence to support an unmodified or modified opinion; or
- b) criteria are not appropriately applied for material emissions, removals or storage; or
- c) the effectiveness of controls cannot be determined when the verifier intends to rely on those controls.

If the responsible party does not correct a material misstatement or nonconformity within 30 days, the verifier/*validator* shall take this into account in reaching a conclusion.

In order to draft an adverse opinion, the validator shall conclude:

- a) there is insufficient or inappropriate evidence to support a modified or unmodified opinion;
- or
- b) criteria are not appropriately applied for material emissions, removals or storage;
- or
- c) the effectiveness of controls cannot be determined when the validator intends to rely on those controls.

Disclaiming the issuance of an opinion



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In order to disclaim the issuance of an opinion, the verification/*validation* team shall ensure that he/she has been unable to obtain sufficient appropriate evidence and can conclude that the possible effects on the GHG statement of undetected material misstatement(s) are material and pervasive.

In order to disclaim the issuance of an opinion, the validator shall ensure that he/she has been unable to obtain sufficient appropriate evidence and concludes that the possible effects on the GHG statement of undetected material misstatement(s) are material and pervasive.

2. Independent Review

Before COSMOCERT issues an opinion/statement, it is independently reviewed to ensure that the risk of issuing the opinion/statement is acceptably low.

Independent reviewers shall be selected who are competent and different from the persons who performed the verification/*validation and who were not involved in the planning of the verification/validation*. The independent review shall be completed before the opinion/statement is issued. The independent review may be performed during the verification/*validation* process to allow significant issues identified by the independent reviewer to be resolved before the opinion/statement is issued.

2.1 Issuance and use of opinion (Verification/Validation Statement)

The opinion and report are issued after the independent review is completed and this is the end of the verification/*validation* process.

The process is repeated in full for all future statements/claims.

The lead verifier/*validator* makes a decision to issue an opinion or not to issue an opinion.

The opinion may include statements limiting the Verifier's/Validator's liability.

If the opinion is modified, the opinion shall include a description of the reason for the modification and shall precede the verifier's/*validator's* conclusion. The verifier/*validator* shall state the reasons for an adverse opinion. If an opinion is disclaimed, the verifier/*validator* shall state the reasons for the decision. The findings in the verification/*validation* report are not intended to be used as advice or as the basis for any decision, including, but not limited to, financial or investment decisions. The verification/*validation* statement, verification/*validation* report and any other element of the process shall not be used in any manner that would alter data and facts. The responsibility of COSMOCERT is to provide a conclusion as to whether the statements made are in accordance with ISO 14064-1, ISO 14064-2 and/or the Verification/Validation programme. The verification/*validation* statement must be used in its entirety (including appendices).

The validity of the verification/*validation* statement will be made available to third parties upon request to COSMOCERT via email info@cosmocert.gr.



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Assurance levels (verification)

There are two levels of assurance, usually determined by the standard or program used for verification:

a) Reasonable assurance – high level	b) Limited assurance – moderate level
<p>Is a level of assurance where the nature and extent of the activities are designed to provide a high but not absolute level of assurance.</p> <p>The verification risk is reduced to an acceptably low level.</p> <p>The process gathers sufficient evidence to conclude that the subject matter conforms in all material respects with identified suitable criteria.</p> <p>The assurance is in the positive form, e.g. 'Based on the processes and procedures conducted, the GHG statement is materiality correct and is a fair representation of the GHG data prepared in accordance with..'</p>	<p>Is a moderate level of assurance where the nature and extent of the activities are designed to provide a reduced level of assurance.</p> <p>The risk is higher than a reasonable level of assurance.</p> <p>The process gathers sufficient evidence to conclude that the subject matter is plausible in the circumstances.</p> <p>The assurance is in the negative form, e.g. 'Based on the process and procedures conducted, there is no evidence that the GHG statement is not materially incorrect, and is not a misrepresentation of GHG data prepared in accordance with..'</p>

Materiality level

The level of materiality is usually determined by the standard or program used for the verification/*validation*.

Materiality is the quantitative threshold or cut-off point above which misstatements, individually or when aggregated with other misstatements, are considered by the verifier/*validator* to be material.

A misstatement is an error, omission, misstatement or misrepresentation in the environmental information statement/GHG statement.

The verifier/*validator* shall confirm the materiality threshold required by the intended users and/or the responsible party. If no materiality threshold has been specified by the intended users, the verifier/*validator* shall (a) establish a materiality threshold and (b) communicate it to the client as set out below:

- (a) Materiality threshold: 5%.
- (b) Agreed via the Application form with the client.



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2.2 Facts discovered after the issue of the verification/*validation* statement

If new facts or information are discovered after the date of issuance that could materially affect the verification/*validation* statement, COSMOCERT will:

- a) communicate the matter as soon as practicable to the client and, if required, the programme owner;
- b) take appropriate action, including the following:
 - 1) discuss the matter with the client;
 - 2) consider if the verification/*validation* statement requires revision or withdrawal.

If the verification/*validation* statement requires revision, COSMOCERT shall implement procedures to issue a new statement including the reasons for the revision. This may include repeating relevant steps of the verification/*validation* process.

COSMOCERT may also inform other interested parties that reliance on the original statement may now be compromised in light of the new facts or information.

Information about the client obtained from sources other than the client (e.g. complainant, regulatory authority) is confidential between the client and the verification/*validation* body. The provider (source) of this information is confidential to the Verification/*Validation* Body and will not be disclosed to the client unless the source agrees.

3. Complaints And Appeals

Written complaints may be submitted to the Verification/*Validation* Body (VVB) by the client (e.g. regarding personnel conduct) or by clients of verified/*validated* clients, other interested parties, etc.

The resolution of complaints shall be made by, or reviewed and approved by, persons not involved in the complaint in question. Where resources do not permit this, any alternative approach shall not compromise impartiality.

A client using the VVB's verification/*validation* services has the right to appeal in writing against decisions taken by the VVB (e.g. not to issue a verification/*validation* statement).

The decision on the appeal shall be made by, or reviewed and approved by, persons who were not involved in the decision that is the subject of the appeal.

In the case of a complaint or appeal, the VVB will acknowledge receipt in writing. It will then undertake, in accordance with its internal procedures, to use independent and qualified personnel to reach a decision and provide a response within 30 days of receipt of the complaint or appeal.



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4. Impartiality

Decisions are based on objective evidence obtained through the verification/*validation* process and are not influenced by other interests or parties.

Threats to impartiality can include but are not limited to the following.

- a) Self-interest: threats that arise from a person or body acting in their own interest. A concern related to verification/*validation*, as a threat to impartiality, is financial self-interest.
- b) Self-review: threats that arise from a person or body reviewing the work done by themselves.
- c) Familiarity (or trust): threats that arise from a person or body being too familiar with or trusting of another person instead of seeking evidence for verification/*validation*.
- d) Intimidation: threats that arise from a person or body having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.

The Verification/*Validation* Body ensures, through a mechanism independent of its operations, that impartiality is being achieved.

5. Confidentiality

The verification/*validation* body shall be responsible, through legally enforceable agreements, for the management of all information obtained or created during the performance of verification/*validation* activities.

The verification/*validation* body shall inform the client, in advance, of the information it intends to place in the public domain.

Except for information that the client makes publicly available, or when agreed between the verification/*validation* body and the client, all other information is considered proprietary information and are regarded as confidential.

When the verification/*validation* body is required by law or authorized by contractual arrangements to release confidential information, the client or individual concerned shall, unless prohibited by law, be notified of the information released.

Information about the client obtained from sources other than the client (e.g. complainant, regulatory authority) shall be confidential between the client and the verification/*validation* body. The provider (source) of this information shall be confidential to the body and shall not be shared with the client, unless agreed by the source.

This confidentially undertaking shall continue for 3 years after termination of the Agreement with client.



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6. Information requirements

The verification/*validation* body shall provide information and update clients on the following:

- a) the applicable verification/*validation* programmes and any changes;
- b) the fees for the verification/*validation* activity;
- c) the verification/*validation* body's requirements for the client to:
 - 1) comply with the verification/*validation* programme;
 - 2) make all necessary arrangements for the conduct of the verification/*validation* activities;
 - 3) make provisions, where applicable, to accommodate the presence of observers (e.g. accreditation assessors or trainee verifier/*validator*);
- d) its policy governing any statement that the client is authorized to use when making reference to its verification/*validation* statement in communication of any kind in line with the requirements in 7, below.



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7. Use of Verification/*Validation* Statement and Mark

The use of the mark shall be traceable back to COSMOCERT as the Verification/*Validation* Body and to the verification/*validation* statement issued.

The reference or marks shall be used only in relation to the verified/*validated* claim and shall not be misleading with respect to product certification.

You shall not use the environmental claim, opinion/statement, report, mark, logo or label in a manner that is likely to mislead intended users or damage the reputation of COSMOCERT.

Marks, logos and labels may include symbols of COSMOCERT or associated with a program.

The use of marks is intended to ensure that you do not use the mark to imply that unverified/*unvalidated* statements have been verified/*validation*. For example, use of a COSMOCERT mark may include placing the mark next to a description of verified/*validated* environmental information in your environmental information report. It is not permitted to use the COSMOCERT's mark on environmental information claims that contain unverified/*unvalidated* information. Examples of acceptable and unacceptable use of the marks are shown below.

		On product ¹	On larger boxes, etc. used for transportation of products ²	In brochures, etc. for advertising ⁵
Use of Mark ³	WITHOUT a statement	NOT ALLOWED	NOT ALLOWED	ALLOWED ⁵
	WITH statement ⁴	NOT ALLOWED	ALLOWED ⁵	ALLOWED ⁵

1. This could be a tangible product itself or a product in an individual package, container, etc.

2. This could be over-packaging of cardboard, etc., that can reasonably be expected not to reach the end user.

3. Mark issued by a verification/*validation* body to be used by you to indicate your verification/*validation* status. This is a mark that has a specific form, including a basic description of its applicability. A statement in words alone does not constitute a mark for this purpose. Any such wording should be true and not misleading. (Mark Colors: Green: CMYK: 85.20.91.6 - RGB: 9.137.69 - PANTONE: 356, Blue: CMYK: 83.38.45.10 - RGB: 39.120.127 - PANTONE: 7475c

Font Colors: Museo Sans Rounded 700 for COSMOCERT, Museo Sans Rounded 500 for A FOODCHAIN ID COMPANY

Notes: In the black version you can leave A FOOD CHAIN ID COMPANY black or grey CMYK 0 0 0 80).



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Example of an acceptable use of mark	
COSMOCERT	<p style="text-align: center;">“Our inventory of greenhouse gas data and information was verified by COSMOCERT.”</p> <p style="text-align: center;">“In its opinion dated 20xx-xx-xx, COSMOCERT concluded [with reasonable assurance] that the data and information in our statement were fairly stated.”</p>
Example of an unacceptable use of mark	
COSMOCERT	<p style="text-align: center;">“Our inventory of greenhouse gas data and information demonstrated that [responsible party name] had achieved its sustainability goals and had realized science-based targets that put us on a path to transitioning to a low carbon economy in alignment with the objectives of the Paris Agreement.”</p>

4. Where permitted by the programme, and; if you wish to use statements taken from the GHG Statement and/or use the VVB Mark or GHG Program Mark for communication purposes, those statements and marks must clearly state the source of the statement, including: the date of the GHG Statement, whether the statements are based on historical/projected or forecast data, and any limitations associated with the statements based on the data and information presented in the specific GHG Statement and applicable mark.

There are 2 (two) types of statements, "short-form" and "long-form" statements, any use of a short-form reference includes or refers to a long-form reference. "Include" means that the long-form reference is provided in proximity to the short-form reference in the same medium. "Make reference to" means that a reference to the location of the long-form reference in another medium (e.g., website) is provided in proximity to the short-form reference. The following are acceptable references for verified environmental information claims.

Subject matter is	Short form	Long form
Historical in nature ^a	“Verified at the reasonable level of assurance”	“In its opinion dated 20xx-xx-xx, COSMOCERT ^b concluded with reasonable assurance that the data and information in our statement were fairly stated.”
Historical in nature ^a	“Verified at the limited level of assurance”	“In its opinion dated 20xx-xx-xx, COSMOCERT ^b found no evidence to indicate that the data and information in our statement were not fairly stated.”
<i>Projected or forecast</i>	<i>“Validated”</i>	<i>“In its opinion dated 20xx-xx-xx, COSMOCERT^b stated that it had not found any evidence to indicate that the assumptions, methods and limitations that we cited in our statement did not provide a reasonable basis for our projections or forecasts.”</i>
^a Historical data and information submitted for verification may be monitored, estimated or modelled.		



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^b When a responsible party refers to a statement as “verified”, the long-form reference applies to any reference implying verification, e.g. by using words such as “verified”, “third-party verified” or “verified by COSMOCERT.”

5 The symbol may then only be used as specified in this document.

References to verification and AUP for statements based on the life cycle assessment of products

Type of reference	Short form	Long form
Functional or declared units (mixed engagement)	“Confirmed”	“The upstream and the core data and information in our statement were verified and the downstream data and information were tested by AUP by COSMOCERT ^a , which did not find any evidence to indicate that our statement was not fairly stated. The verification opinion of the COSMOCERT ^a and the report of factual findings were issued on 20xx-xx-xx.”

^a When a responsible party refers to subject matter as “verified”, the long-form reference applies to any reference implying verification, e.g. by using words such as “verifier”, “third-party verifier” or “COSMOCERT”.



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8. Principles of Operation

COSMOCERT will undertake verification/*validation* according to:

- ISO 14065 – General principles and requirements for bodies validating and verifying environmental information.
- ISO/IEC 17029 Conformity assessment- General principles and requirements for validation and verification bodies.
- ISO 14064-3- Greenhouse gases- Part 3: Specification with guidance for the verification and validation of greenhouse gas statements.
- IAF MD 6: IAF Mandatory Document for the Application of ISO 14065
- ISO 14066 - Environmental information- Competence requirements for teams validating and verifying environmental information.

Principles of verification/*validation* are as follows:

- Impartiality
- Competence
- Confidentiality
- Openness
- Responsibility
- Risk-based approach

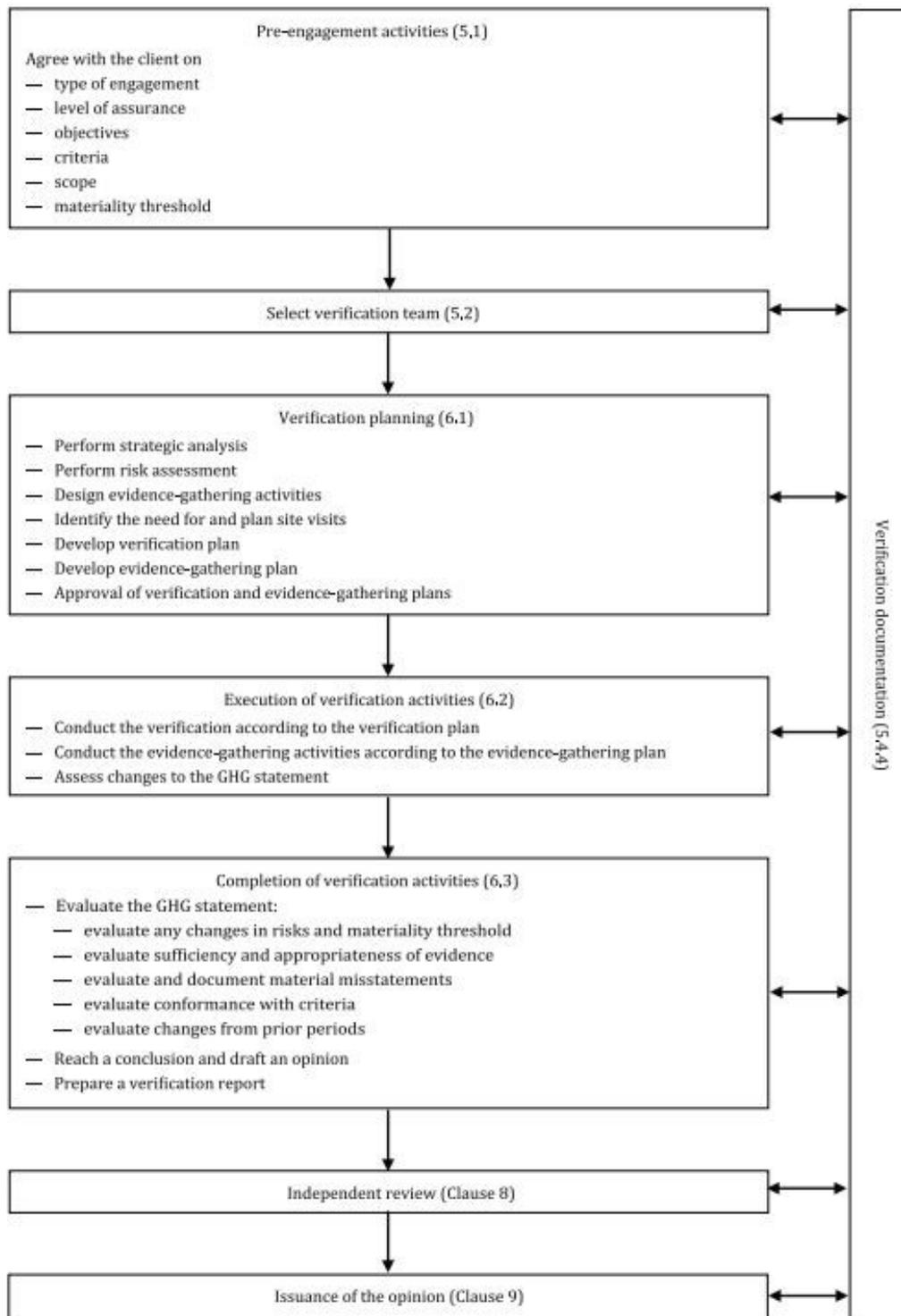
The overall process is described below:

Step	Task Description	Verification/Validation Body (VVB)	Client
Pre-Engagement			
1.	Submission of completed Application (pre-engagement form)		x
2.	Application review and financial offer	x	
3.	Signed financial offer returned by the client and sending agreement for signing (by the VB)	x	x
4.	Submission of signed Agreement and GHG Data		x
Verification/<i>Validation</i> Process			
5.	Strategic and Risk Analysis	x	
6.	Verification/ <i>validation</i> plan for on-site visit	x	
7.	If necessary, clarifications and corrections		x
8.	Verification/ <i>Validation</i> report	x	
9.	Independent Review	x	
10	Issue of Verification/ <i>validation</i> Opinion/Statement	x	
11	Miscellaneous	x	



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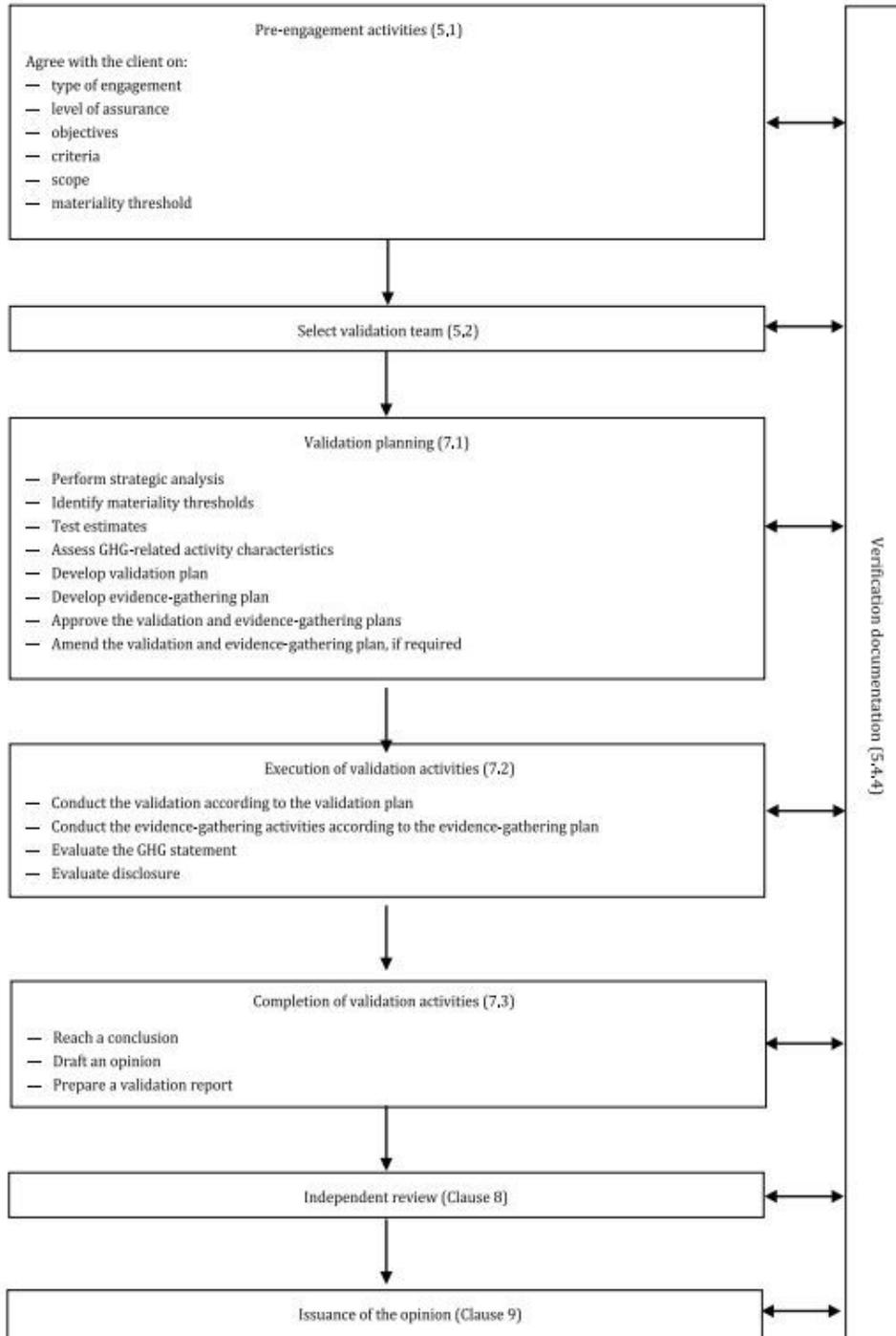
ANNEX I: VERIFICATION PROCESS





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9. LIST OF AMENDMENTS

Version No	Effective date	Written by	Description of Amendment
1.	01/03/2024	QAM	INITIAL VERSION IN ACCORDANCE WITH ISO 17029, ISO 14065, ISO 14064-3
2.	01/04/2024	QAM	All addition in color <i>red</i> and <i>italics</i>
3.	13/01/2025	QAM	New version including all requirements for both ISO 14064-1 & ISO 14064-2