IUCN | National Committee United Kingdom

Peatland Programme

PEATLAND CODE

Validation and Verification Scheme Document

V1.0 Oct 2024

Contents

Background

The Validation and Verification bodies (VVBs) are independent third parties that independently validate and verify Peatland Code projects and their greenhouse gas (GHG) assertions. Peatland Code projects and their GHG assertions shall be verified by the VVB to a limited or reasonable level of assurance[1]. ISO 14065:2020 and ISO 14064-3:2019 shall be used as the governing standard for Peatland Code validation and verification delivery.

This document set outs the IUCN UK Peatland Programme requirements for VVBs, including accreditation, and guidelines on Validation and Verification.

Normative References

This document shall be read in conjunction with the following documents:

- Peatland Code v2.1
- Peatland Code Guidance Document v2.1
- Peatland Code Field Protocol v2.1
- Clarification and Minor revisions document

Definitions

For the purpose of this document the following definitions apply:

i) **Shall:** represents a mandatory requirement

ii) **Should:** represents recommendations or best practices that project developers should aim to implement on their projects

iii) **May**: represents a course of action permissible by the Peatland Code

iv) **Validation/Verification Body** – independent organisation appointed to carry out validation and verification of a GHG programme.

v) **Validation** - The systematic, independent, and documented process for the evaluation of a GHG assertion within a project plan to determine if it conforms to the agreed requirements and if its implementation can be expected to result in the proposed GHG benefit. Undertaken by a validation/verification body.

vi) **Verification** - The systematic, independent, and documented process for the ongoing evaluation of a project and its GHG assertion against the agreed requirements. Undertaken by a validation/verification body.

vii) **Validation Opinion** - formal written declaration attesting to the intended user that implementation of the planned GHG project will take place in the given time frame.

viii) **Verification Opinion**- formal written declaration to the intended user that provides assurance that the responsible party's GHG assertion is stated within the defined level of assurance and materiality in accordance with the applicable verification criteria.

1.0 Becoming an approved Peatland Code VVB

1.1 Eligibility criteria

Third-party organisations seeking approval as validation/verification bodies (VVBs) for the Peatland Code shall meet the outlined requirements. In exceptional cases, the Executive Board may grant conditional approval to VVBs. However, in most cases if the requirements are not met the organisation will not be accepted as an approved VVB. Only approved/conditional approved VVBs are permitted to carry out validations and verifications for Peatland Code projects.

The Validation/Verification body shall:

- Have a legal entity in the UK and abide by the UK Law and Regulations
- Be accredited under the sectoral scope of Agriculture Forestry Other Land Use (AFOLU) to ISO/IEC 17029:2019 Conformity assessment – General requirements for verification and validation bodies and sector application ISO/14065:2020 General principles and requirements for bodies validating and verifying environmental information.
- Extend the UKAS accreditation (extension of scope) to the Peatland Code within two years of being an approved VVB.
- Have completed the IUCN UK PP conflict of interest form.
- Is not linked or have any affiliation to the UK Land Carbon registry or benefit from the sale of carbon units.
- Meet the Principles for Validation/Verification bodes set out in ISO 17029 4.3
- In addition to the ISO 14066:2023, ISO 17029:2019, 4.3.2 Competence, VVB staff and auditors shall have the following skills and expertise:

    i. Knowledge and understanding of peatland management practices, including peatland restoration and the ability to distinguish and explain differences between healthy and degraded peatland vegetation communities.
    ii. Understanding of GIS software and ability to read and understand mapped outputs and use field software.
    iii. Project management, organisation and prioritisation of workloads

1.2 Application Process

If the eligibility criteria have been met a VVB may apply to the Peatland Code Executive Board to carry out validation and verifications for the Peatland Code using the online application form. Following Executive Board (conditional) approval, the VVB shall attend a two-day training course on the Peatland Code, delivered by the Peatland Code team.

Once the training has been completed the Peatland Code team will organise bi-weekly meetings with the new VVB to discuss taking on new projects and go through any questions they might have for the first few months. After this, meetings will move to a monthly basis.

2.0 Managing VVB relationship

2.1 Agreement between VVB and IUCN UK PP

The IUCN UK PP has an MoU in place with each of the VVBs which outlines expected ways of working. Any new VVB shall sign an MoU before engaging with Peatland Code projects. Clarification on the requirements of the Peatland Code may be sought but the decision to award or retract validation/verification rests solely with the appointed body. The Peatland Code Executive Board does, however, retain the rights to terminate, or suspend a VVB should they no longer meet the eligibility requirements or are seen to be involved with malpractice/fraudulent claims.

2.1 Communication

The Peatland Code team holds monthly meetings with the VVBs separately to continually monitor their performance and support in any PC related queries. Once a quarter the Peatland Code team meets with all VVBs together to discuss any changes that might affect the validators and to ensure consistency across all the VVBs. The VVBs shall send monthly updates on pending validations and verifications to the Peatland Code team, so they can maintain oversight of all projects as well as waiting times.

VVBs are also members of the Technical Advisory Board (TAB) and Market and Investment Forum which allows them to get up-to-date information on projects, minor revisions, and clarifications for the Peatland Code, as well as advice on auditability of proposed changes to the Peatland Code.

2.3 Oversight

The IUCN UK Peatland Programme requires the validation and verification process to be impartial and carried out consistently across all approved VVBs against the Peatland Code requirements and in accordance with ISO 17029:2019 9.1, ISO 14065: 2020. However, the IUCN UK PP keeps oversight over the VVBs via regular meetings (outlined above) and by checks of validated/verified documents:

A member of the Peatland Code team ensures that no essential information is missing by reviewing the validated/verified documents provided by the VVB. Any findings or discrepancies identified during this review are communicated back to the VVB. Once everything aligns, the VVB grants approval for the validated documents and issues validation or verification opinion. These approved documents and opinions are then uploaded onto the UK Land Carbon Registry. See more details in final opinion section.

3.0 Performance Review

The IUCN UK PP works in collaboration with United Kingdom Accreditation Service (UKAS) to carry out Performance reviews to maintain and where needed improve the quality and efficiency of validation and verification under the Peatland Code. UKAS conducts annual audits of accredited VVBs to ensure the conformity to the ISO standards are still being met which forms part of a systematic review. The VVB shall send IUCN UK PP copies of the UKAS assessment reports as demonstration that this requirement is met.

In addition, the IUCN UK PP will monitor the performance of VVB from the following elements:

- Meeting the requirements set out in the MoU
- Completing validations in a timely manner
- Completing annual UKAS assessments against the ISO standards and maintaining UKAS accreditation to the ISO standards.

If a VVB fails to comply with UKAS or loses its UKAS accreditation, the Executive Board will review the situation and may suspend the VVB. See section 5 suspensions, terminations, and reinstatements.

4.0 IUCN UK PP requirements for VVBs

The VVB should follow the principles set out in ISO/IEC 17029:2019, 4.2, 4.3 and 9.1 as the basis of Validation and Verification process. Details on the materiality, level of assurance and final opinion can be found in section 4.3.

4.1 Validation

In addition to the general process set out in ISO 17029:2019 Clause 9.1 the VVB shall meet the following requirements detailed below:

4.1.1 Project Plan Validation:

Requirement

The VVB shall review the documents below against the requirements set out in the Peatland Code and Field protocol. Every document must be checked against the version of the Peatland Code the project is validated against. The version of the Peatland Code the project is being validated against should be stated in advance. Details on opinion statements, materiality and non-conformance are detailed in section 4.2 Peatland Code Assessments.

VVB Guidance: Validation cannot be completed until all documents below are provided in full. Incomplete or incorrect documents will be returned to VVBs for corrections when picked up at IUCN UK PP checks or Registry checks. To ensure a speedy validation process VVBs should check the documentation thoroughly before submitting to IUCN UK PP or the Registry.

.

Peatland Code Mandatory Document	VVB check requirement	VVB Guidance	IUCN UK PP Validation Check requirement
Project Design Document	Check that all fields are completed and accurate. Using the project grid reference VVB shall check the project is not registered under another standard to ensure no double counting.	Any amendments to the emissions calculator or additionality calculator will affect the PDD in some way. If the grid reference in the map is amended this will also be reflected in the PDD. Additional guidance regarding the consultation: The information shall include details of consultation methods, including comments and how these will be addressed. Any grievances or objections will be added Annex 1. If the VVB feel that insufficient information has been included to meet the Peatland Code	Document must be fully completed with no blank sections

Peatland Code Mandatory Document	VVB check requirement	VVB Guidance	IUCN UK PP Validation Check requirement
		requirement the VVB will request more evidence	
Emissions calculator	VVB shall check the start date, duration, hectares and emission reductions match the other Peatland Code documents. Ensure that correct formulas are used for Table 6.	When projects amend the duration in table 6 to something other than stated in the template, check that the correct formula has been written in and not just a manually entered emissions reduction number.	Document must be fully completed and correspond to the PDD and additionality calculator information.
Additionality calculator	Costs should reflect the work stated in the Management and Monitoring Plan. Costs shall be in the correct sections as not to incorrectly affect the public/private finance percentage.	Please see Section 1.5 of the Peatland Code and the Guidance tab of the Additionality Calculator template.	% grant funded cannot exceed 85%.
Proof of any other income (e.g. public grant)	Check that the amount in the proof document is reflected in the additionality calculator	N/A	Requested as evidence at validation
Risk assessment	The monitoring plan shall link to the risk assessment. All potential hazards are identified and addressed, with a 'Risk Rating with Controls' rating of 'Tolerable' or better. Risk Assessment must link to the monitoring plan.	Guidance tab of the Risk Assessment template.	All risks have a rating of tolerable or better.

Peatland Code Mandatory Document	VVB check requirement	VVB Guidance	IUCN UK PP Validation Check requirement
Project maps	The map must adhere to the Field Protocol version requirements that the project is validated against. However, in cases where the site survey was undertaken prior to the release of a new version of the Field Protocol, that site survey can be validated against the relevant earlier Field Protocol up to 2 years after the update.	See the Peatland Code Field Protocol. If the project has changed between Project Plan Validation and Restoration Validation in hectarage, duration, peat depth or condition, a revised map is required.	Must adhere to the Field Protocol version it was validated against However, in cases where the site survey was undertaken prior to the release of a new version of the Field Protocol, that site survey can be validated against the relevant earlier Field Protocol up to 2 years after the update.
Shapefiles of project area	Shall be provided to a level that VVBs can be confident to validate against.		Not required.
Management plan (see Peatland Code for requirements)	VVB shall check that all sections of the Management Plan template are completed with enough clarity and detail that in later years anyone reviewing this document will have a full understanding of the planning and processes behind the restoration.	For versions prior to 2.0 that do not require the Management and Monitoring Template, it is common to find that the *statement of the individuals involved in the delivery of the restoration and management activities and their expertise* is missing. For this section we do not expect the names of the contractors, but the skills, experience required and qualifications such as licences to operate machinery are essential.	Document must be fully completed with no blank sections. Prior to version 2.0 we can accept incomplete management and monitoring documents, providing the information is captured elsewhere (such as the social impact section of the PDD, for example).
Monitoring plan (see Peatland Code for requirements)	The VVB shall check that all sections of the Monitoring Plan template are completed with enough clarity and detail that in later years anyone reviewing this document will have a full understanding of the planning and monitoring behind the restoration.	See above Management Plan guidance.	Document must be fully completed with no blank sections. Prior to version 2.0 we can accept incomplete management and monitoring documents, providing the information is captured elsewhere (such as the social

Peatland Code Mandatory Document	VVB check requirement	VVB Guidance	IUCN UK PP Validation Check requirement
			impact section of the PDD, for example).
Peat depths at each survey point using the template provided	VVB shall ensure that the survey data and the project duration in the other documents align with the % survey points over peat depth (cm).	Instructions tab of the peat depth survey template.	Peat depth recordings in the template and % survey points over the peat depth matches the stated project duration.
Water table data for fens	A minimum baseline of 12 months is required. VVB shall check the expert that drew up the water table monitoring design meets the PC competency requirements set out in the Field Protocol.	See the Peatland Code Field Protocol t.	
Baseline evidence	Baseline evidence as per the Field Protocol.	As stated in the Peatland Code Guidance: *restoration could start prior to completion of Project Plan Validation. In this instance the risk of not achieving Project Plan Validation is for the project (no additional baseline evidence can be collected).*	
Landowner and Project Developer commitments	Signed statement by both the controlling party/parties of the land and project developer with no alterations to the document.	Some projects have in the past altered the commitment statement to fit their own requirements. This is not permitted, and the Peatland Code team must be consulted if a project attempts to do so.	Signed statement by both the controlling party/parties of the land and project developer with no alterations to the document.

Peatland Code Mandatory Document	VVB check requirement	VVB Guidance	IUCN UK PP Validation Check requirement
Land ownership evidence	Legal ownership, or tenure of the land for the duration of the project, shall be demonstrated for the project area. VVBs are required to have evidence of this.	See section 1.3 of the Peatland Code.	Not required.
Communications Agreement (document owned by S&P Global)	Document signed by both the Project Proponent and Authorised Representative. The Registry provider checks this further, so no other checks required from the VVB.	If the Project Proponent and Authorised Representative are the same entity, the document is not required.	Document completed and signed by both parties.

4.1.2 Restoration Validation

Requirement: The following documents shall be reviewed by the VVB:

- Final restoration report
- Proof of public funding received
- Optional: Emissions calculator

The evaluation shall consist of a review of the documentation mentioned above and a site visit to determine if Peatland Code requirements have been met. During the site visit the independent auditor will walk over the site and check for evidence that the work stated at Project Plan Validation has been carried out. If during the site visit the auditor sees evidence of restoration works failing which could lead to a reversal in condition category i.e evidence of increased deer numbers, erosion evidence, dams failing, these issues will be raised as a comment on the validation opinion statement.

VVB Guidance: If diverged from validated restoration plan the following documents need to be adjusted accordingly and resubmitted:

- Project Design Document
- Emissions calculator
- Additionality calculator
- Project maps (see Field Protocol for guidance)

These documents shall be the same version as used for Project Plan Validation with the exemption of the emissions calculator if no PIUs are issued.

The true cost of the restoration shall be reflected in the Restoration Validation additionality calculator, so it is likely the documents will require a minor update as the % public funding may change and will also need reflecting in the Project Design Document.

If projects wish to use the emission factors of a later version for Restoration Validation, with no other change from Project Plan Validation and have not already had PIUs issued then they may do so by submitting a new version of the Emissions Calculator.

4.2 Verification

Requirement:

In addition to the general process set out in ISO 17029:2019 Clause 9.1 the VVB shall evaluate the claim made by the project developer about the condition category of the peatland against the baseline condition category presented at Project Plan Validation (criteria). The evaluation will consist of a check of the submitted PC documents and a site visit to determine if the requirements of the Peatland Code have been met and the GHG assertions materially is correct.

Verification is conducted by an approved third-party independent verification body who will evaluate

- Project Progress Report[2]
- Condition change monitoring report (see Field Protocol for guidance)
- Fixed-point photographs/drone imagery (see Field Protocol for guidance)
- Updated AU map if different to validated AU map
- Updated emission calculator using the latest version template, but with the same percentage contribution to the risk buffer as during validation (unless the risk buffer is depleted, and projects are required to add more units to the risk buffer).
- Landowner, tenant and agent contact details (if any parties have changed since last assessment)

[2] Template available at www.iucn-uk-peatlandprogramme.org/peatland-code/introduction-peatland-code/projects

- For fens: water table data (see Field Protocol for guidance)
- For fens: monthly and annual emission calculators using the water table data for the duration of the vintage

Requirement*:* In addition to the ISO requirement on evidence gathering ISO 14064-3 **7.1.6** the independent auditor shall walk over the site and carry out a risk-based assessment of any evidence on site at risk of reversal in condition category, e.g., evidence of increased deer numbers, erosion evidence, dams failing. The auditor shall also check if the average percentage of condition category within the surveyed circles (see Field Protocol) matches the information reported in the Project Process Report of a minimum of 10% of the circles. Details on opinion statements, materiality and non-conformance are detailed in section 4.3 Peatland Code Assessments.

The average percentage recorded is used to convert PIUs to PCUs for each Assessment Unit, i.e. if 90% within one Assessment Unit has changed to the next condition category, 90% of PIUs are converted to PCUs within that category.

VVB Guidance: If during the site visit the auditor identifies a percentage of bare peat still present at year 5 the associated PIUs for this vintage will be cancelled. For example, if within the survey circles 10% of the total pre-restoration condition category “Actively Eroding” is still bare peat, 10% of PIUs are cancelled and only 90% is converted to PCUs. However, if by year 15 the bare peat is no longer visible and has been replaced by revegetated peat, associated PIUs in that vintage may then be converted to PCUs.

Requirement: It is acceptable to have the same validation/verification body perform validation and verification for the same project. However, after three consecutive verifications with the same validation/ verification body projects shall have the fourth verification with a different validation/verification body to ensure impartiality and accuracy

4.3 Peatland Code Assessments

Validation and verification are risk-based processes and shall be carried out in conformance with IS0 14064-3:2019, 7.1.5 and A.4.3.2.4 and ISO 14065:2020. In addition, the following applies:

Materiality in the context of GHG projects refers to the significance of errors, omissions, or misrepresentations in GHG data and how these can impact the overall GHG assertion and the resulting opinion statement. Materiality has both qualitative and quantitative aspects. A lack of response from the project proponent regarding a misstatement or non-conformity (see non-conformance section) can also affect the opinion statement.

4.3.1 Site Visits

Requirement: The site check may be done virtually if the evidence (for example an orthorectified map from drone images, with potentially additional photographs of specific haggs/gullies, fixed point photographs, etc.) submitted allows this. However, the validator may request additional evidence to be submitted and if the validation body cannot adequately check the baseline virtually, an in-person site visit shall be arranged.

4.3.2 Non-Conformances

Requirement*:* The VVB shall have a process to issue projects with non-conformances and manage any non-conformances raised during a PC assessment. The timeline for response should be agreed between the validator and the client.

The type of non-conformance that a VVB can raise are:

Non-conformance: Any errors in meeting the Peatland Code requirements (criteria) such as, but not limited to, poorly managed documentation, discrepancies in information provided but that **does not affect** the GHG assertion. This shall be addressed by the project proponent before an opinion statement is issued.

Misstatement: Any issue with the potential to affect the GHG emission reduction compared to what has been stated. For example, at verification the average percentage of condition category improved does not match the information reported in the Project Progress Report.

4.3.3 Opinion types

Requirement: A VVB shall issue a landowner/project developer a validation/verification opinion after each formal PC assessment. The VVB shall issue an opinion on the GHG assertion as set out in ISO 17029:2019 Clause 9.7, ISO 14065:2020 Clause 9.7 and 14064-3:2019, 9 for validation or verification opinions.

The types of opinions as detailed in the ISO 14064-3:2019 shall be selected:

Unmodified: The project meets all the required standards without any changes.

Modified: The project meets the standards but with some modifications or conditions.

Adverse: The project does not meet the required standards, and significant issues need to be addressed.

Disclaimed: Insufficient information provided to form an opinion[3]2 above

At validation provided all non-conformance are addressed by the project developer the opinion statement shall be unmodified. The VVB shall only issue a disclaimed opinion if the non-conformances have not been addressed in the agreed timeframe despite multiple attempts to gain the information required.

If any misstatements are raised at verification by the VVB, projects shall address the misstatements raised before a modified opinion shall be issued. If a project fails to response to the misstatement in the given timeframe by the VVB the opinion will be adverse.

4.3.4 Level of Assurance

Assurance is provided by validation/verification and gives confidence to stakeholders and parties interested in the GHG assertion. Validation has no level of assurance. verification shall be to a limited or reasonable level of assurance with respect to material errors, omissions, and misrepresentations.

4.4 Final Opinion

Requirement: The VVB shall submit an unsigned validation/verification opinion to IUCN PP UK via email alongside all other required documents. After reviewing the opinion and validation/verification documents against Peatland Code requirements, the IUCN PP UK shall confirm that the opinion statement can be signed and uploaded onto the registry

The VVB shall sign and date the final opinion statement, which will then be uploaded to the public view of the registry. A project plan validation opinion expires **three years** from the date of issued however restoration validation opinion is valid until the Year 5 verification is due.

4.4.1 Opinion Information

Requirement

In addition to the requirement set out in ISO 17029:2019 Clause 9.7.2 and 14064-3:2019, 9.3 the statement shall contain the following information:

- Project Name
- Markit Registry number/ID
- Client Name
- Landowner/Project Developer
- Location information
- GHG assertion
- Site validation date
- Peatland Code Versions
- Opinion

[3] If sufficient information cannot be obtained and the information is necessary for the verifier/validator to form a conclusion, the verifier/validator shall not proceed with the verification/validation and shall disclaim the issuance of an opinion.

4.4.2 Information provided after the opinion statement has been issued

The VVB shall communicate with IUCN UK PP if the information provided could materially affect the opinion decision as set out in ISO 14064-3, 10.

5.0 Suspension/Termination and Reinstatement

The Peatland Code Executive Board retains the rights to terminate or suspend a VVB should they no longer meet the eligibility requirements or are seen to be involved with malpractice/fraudulent claims. In the event of having no approved VVBs, the Peatland Code Executive Board shall pause any Peatland Code validation and verifications until a suitable approved VVB is appointed.

5.1 Suspension

The IUCN UK PP may suspend a VVB under the following circumstances:

- Persistent delays in service levels which have not been addressed despite multiple formal requests from the Executive Board.
- Failure to participate in the annual audit required for maintaining ISO accreditation
- Losing ISO 14064-3:2019 and 14065:2020 accreditation
- Suspended by UKAS

The duration of the suspension will be decided based on the reason for the suspension and will be communicated in writing to the VVB. Details of the suspension will then be published on the IUCN UK PP website for transparency. During any suspension, the VVB will be unable to validate or verify any Peatland Code projects. Should the VVB disagree with the suspension they can appeal the decision via the appeals process detailed here.

5.2 Termination

The IUCN UK PP may terminate a VVB under the following circumstances:

- Engagement in unlawful or fraudulent activities
- Failure to address reasons for being suspended in the given timeframe after multiple follow up attempts
- No longer meet the eligibility criteria required to be an approved VVB

5.3 Reinstatement

A suspended VVB can be reinstated by the Executive Board once:

- The suspension from UKAS has been lifted.
- Annual ISO 14064-3:2019 and 14065:2020 accreditation has been granted.
- Evidence that improved process and capacity will reduce any delays and meet the requirements set out in the MoU.

6.0 Grievance and Appeals process

The IUCN UK PP is committed to ensure that the grievance and appeal process is as transparent and fair as possible. If you have any of the grievances go to our website to find out more information and next steps.