

## **Clarification of Validation and Verification Body Rotation Requirements**

Effective July 3, 2025

This guidance clarifies the Validation and Verification Body (VVB) rotation requirements for ACR GHG Projects.

Section 9.H of the ACR Standard states “ACR requires that Project Proponents utilize a different VVB at a minimum of every five (5) years of reporting or five (5) verifications (including both full and desk-based reviews), whichever comes first.” ACR offers the following clarifications, depending on whether the project has multiple reporting periods or a single reporting period.

- For multiple reporting period projects, the text is interpreted as “ACR requires that a Project Proponent of a multi-reporting period GHG Project utilize a different VVB at a minimum after every five (5) years of reporting or five (5) verifications of the GHG Project (including both full and desk-based reviews), whichever comes first.”
- For single reporting period projects, the text is interpreted as “ACR requires that a Project Proponent of single reporting period GHG Projects utilize a different VVB at a minimum after every five (5) verifications of such projects (including both full and desk-based reviews), whichever comes first.” This means that a Project Proponent would need to rotate VVBs every 5 projects – regardless of which single reporting period methodology the projects are developed under.

Section 9.H of the ACR Standard also states “For project types with only one Reporting Period and therefore only one verification per project, VVBs may conduct no more than five out of nine sequential verifications of projects developed at the same facility.” ACR clarifies that this is a further rotation requirement, only applicable to single reporting period projects that occur at common facilities used by multiple Project Proponents. It is applicable to the consideration of full and desk-based reviews. This requirement is broader than any individual Project Proponent and in place to ensure VVB rotation at the facility.

For single-reporting period projects, conformance with VVB rotation requirements is assessed in the context of initial Project-Specific Conflict of Interest Form (COI form) submission dates, as of the date of the initial COI form submission under review. For the Project Proponent/VVB rotation check, the last five projects will be used to evaluate the submission for conformance to the rotation requirements. For the facility/VVB rotation check, the last nine projects will be used to evaluate the submission for conformance to the rotation requirement.