



REGULATION

REVIEW'S REGISTRATION

PERFORMED REVIEWS		
REVIEW	DATE	OBJECT OF THE REVIEW
0	January 24 th , 2018	First issuance
1	March 18 th , 2018	Inserted the inputs from the ORP meeting of January 26 th , 2018
2	November 19 th , 2019	Transition of ISO 14067:2018 and ISO 14064-1:2018 and introduction of the "mixed-engagement" approach
3	August 13 th , 2020	Section 9.1 modified to include the "Mark's use guidelines" updates
4	January 20 th , 2021	Par. 7.4 – Carbon Neutrality added, update after the release of ISO 14065:2020, minor corrections in the text
5	May 22 nd , 2023	Update on the procedure for registration and usable marks
6	December 12 th , 2023	Updating mark in the header and text and complying with ISO 14068-1



INDEX

1. CARBON FOOTPRINT ITALY	4
2. ACRONYMS	4
3. DEFINITIONS	5
4. GOAL	5
5. REFERENCE STANDARDS	6
6. ORGANISATIONAL STRUCTURE	7
6.1 General overview	7
7. DESCRIPTION OF THE PROGRAMME CODIFICATIONS	8
7.1 Carbon Footprint of Product.....	8
7.1.1 PCR	9
7.2 Organisation' GHG Inventory	10
7.3 Carbon Reduction	12
7.4 Carbon Neutrality.....	13
8. HOW TO PARTECIPATE IN THE CFI PROGRAMME	14
8.1 Application for registration.....	16
8.2 Registration requirements.....	16
8.3 Request for registration.....	16
8.4 Registration costs.....	17
8.5 Publishing	17
9. Requirements for the use of the CFI marks	17
9.1 General criteria	17
9.1.1 Marks related to products	18
9.1.2 Mark related to organisations	18
9.2 Cessation in the mark's use	19
9.3 Improper use of the mark.....	19
10. COMPLAINTS MANAGEMENT	19
10.1 Complaints and appeals	19
11. DATA CONFIDENTIALITY	20



12. THE VERIFICATION BODIES	20
12.1 Procedure for verifying the competence of verifiers	20
12.2 Additional rules for the verification of GHG emissions	20
13. REVISION PERIOD OF THE REGULATION	23



1. CARBON FOOTPRINT ITALY

Carbon Footprint Italy is the Italian *Programme Operator* dedicated to the communication of the results of the quantification of greenhouse gas (GHG) emissions of products and organisations, of their reductions and of the Carbon Neutrality certification.

The participation to the Carbon Footprint Italy *Programme Operator* is open to all national and international organisations in possession of an accredited third-party verification statement, concerning the quantification of their GHG emissions, at product or organisation level.

The CFI *Programme Operator* does not perform the verification of product and/or organisation on its own account but relies on independent third-party verification statements issued in accordance with internationally valid and recognised on the market standards.

A Carbon Reduction section is also encompassed, specifically dedicated to the GHG emissions reduction achieved as a result of mitigation measures, both in terms of product and organisation.

Lastly, in the CFI programme there is a section dedicated to the release of the *Carbon Neutrality* mark on the basis of the reduction and offsetting actions of GHG emissions.

Companies and products registered in the CFI *Programme Operator* can use a set of dedicated marks for the communication of their emission values or reduction of GHG.

2. ACRONYMS

CFI: Carbon Footprint Italy

CTS: Technical-Scientific Committee

DIR: Directorate

ETS: Emission Trading System

GHG: Green House Gases

LCA: Life Cycle Assessment

ORP: Representative Body of the Parties

PCR: Product Category Rules

SGT: Secretariat



3. DEFINITIONS

Logo: registered badge of the CFI *Programme Operator*, used to represent it. Only CFI can use its own logo.

Mark: badge that the CFI *Programme Operator* grants for use to those who participate the CFI programme by registering their products and/or organisations in the "CFI Register" section, accessible online at the website www.carbonfootprintitaly.it/en/.

Verifiers: in this Regulation, this term refers to a Verification Body, i.e. a body that performs independent third-party verification activities subject to accreditation according to Reg. 765/2008.

CFP: sum of greenhouse gas emissions and greenhouse gas removals in a product system, expressed as CO₂ equivalent and based on a life cycle assessment using the single impact category of climate change (source: ISO 14067: 2018 section 3.1.1.1)

GHG inventory: list of GHG sources and GHG sinks, and their quantified GHG emissions and GHG removals (source: ISO 14064-1: 2019 section 3.2.6).

Note: GHG inventory is also defined *Carbon Footprint of Organisation*.

GHG programme: voluntary or mandatory international, national or subnational system or scheme that registers, accounts or manages GHG emissions, GHG removals, GHG emission reductions or GHG removal enhancements outside the organisation or GHG project (Source: ISO 14064-1: 2019 section 3.2.8).

Carbon Neutrality: state of being carbon neutral (Source: ISO 14068-1:2023 definition 3.1.2.).

Carbon Neutral: condition in which during a specified period, the carbon footprint has been reduced as a result of greenhouse gas (GHG) emission reductions or GHG removal enhancement and, if greater than zero, is then counterbalanced by offsetting. (Source: ISO 14068-1:2023 definition 3.1.1.).

4. GOAL

The present Regulation describes the operating modes of the Carbon Footprint Italy (CFI) *Programme Operator* and the participation requirements for companies and products interested in obtaining the CFI registration.

Chapter 5 lists the standards used for the development of the programme (e.g. ISO 14025 and ISO 14026) or that regulate the participation requirements (e.g. ISO 14067, ISO 14064-1 and ISO 14068-1).

Chapter 6 describes the main organisational aspects of the CFI *Programme Operator*.



Chapter 7 describes the characteristics and basic requirements for participating in the various codification of CFI programme.

Chapter 8 indicates how to participate in the programme.

The following chapters report other general aspects of the programme's functioning (e.g. management of complaints, confidentiality, etc.)

Further documentation mentioned in the present Regulation, at the base of the operation of CFI programme is available in the "CFI Documents" section of the website www.carbonfootprintitaly.it/en/.

5. REFERENCE STANDARDS

The development of the present Regulation was performed by referring to definitions and contents from the following standards:

- ISO 14020:2002, Environmental labels and declarations - General principles.
- ISO 14025:2010, Environmental labels and declarations - Type III environmental declarations - Principles and procedures.
- ISO 14026:2017, Environmental labels and declarations — Principles, requirements and guidelines for communication of footprint information.
- ISO/TS 14027:2017, Environmental labels and declarations - Development of product category rules.
- EN 15804:2014, Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products.
- ISO 14064-1:2006, Greenhouse gases — Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals.
- ISO 14064-1:2018, Greenhouse gases - Part 1: Specification with guidance at the organisation level for quantification and reporting of greenhouse gas emissions and removals.
- ISO 14064-3:2006, Greenhouse gases – Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions.
- ISO 14064-3:2019, Greenhouse gases – Part 3: Specification with guidance for the verification and validation of greenhouse gas statements.
- ISO 14065:2013, Greenhouse gases -- Requirements for greenhouse gas validation and verification bodies for use in accreditation or other forms of recognition.
- ISO 14065:2020 - General principles and requirements for bodies validating and verifying environmental information
- ISO 14067:2018, Greenhouse gases – Carbon footprint of products -- Requirements and guidelines for quantification.



- Directive 2003/87/EC of the European Parliament and of the Council and subsequent modifications and additions, establishing a scheme for greenhouse gas emission allowance trading within the Community.
- ISO 14068-1:2023, Greenhouse gas management and climate change management and related activities — Carbon neutrality

6. ORGANISATIONAL STRUCTURE

6.1 General overview

Carbon Footprint Italy S.r.l., headquartered in Via Niccolò Tommaseo 17 - 35131 Padua (PD), is the Programme Operator of **Carbon Footprint Italy (CFI)**.

The **CFI Directorate (DIR)** has the decision-making, managerial and financial responsibility of the entire operating structure.

Additionally, the CFI Programme Operator operates through the following institutional bodies:

- a) Secretariat;
- b) Technical-Scientific Committee;
- c) Representative Body of the Parties.

Secretariat: the Secretariat (SGT) is responsible for the ordinary operation of the CFI, for both administrative and operational aspects.

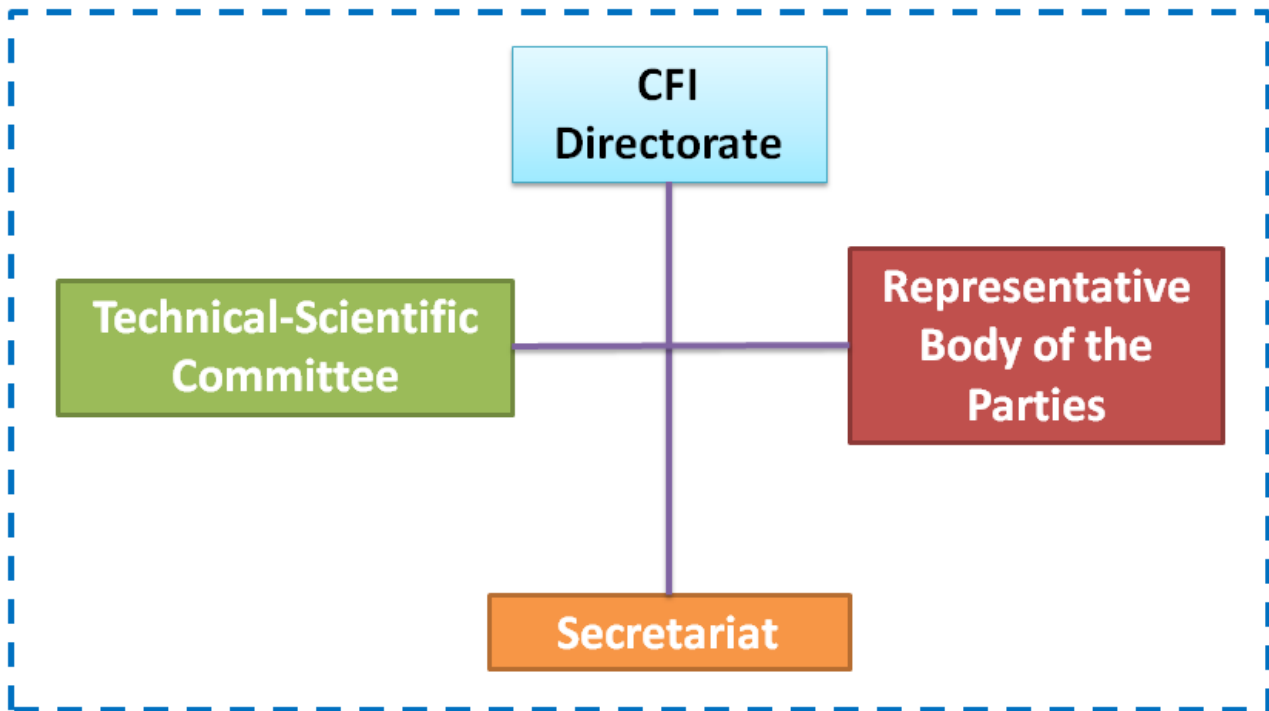
Technical-Scientific Committee: it is made up of experts in Life Cycle Assessment (LCA) and quantification of GHG emissions of organisation, and represents the technical-scientific support body for the programme's regulation system.

Representative body of the Parties: it is the stakeholders' committee, with the role of representativeness on the market and of control of the CFI's impartiality.

For a detailed description of the functions of the CFI Programme Operator and the responsibilities of the institutional bodies, please refer to the dedicated procedure "CFI Organisational Structure".

The organisational chart that describes the functional links of the four bodies of the CFI is reported below.

Programme Operator CFI



7. DESCRIPTION OF THE PROGRAMME CODIFICATIONS

Carbon Footprint Italy is the Italian programme operator dedicated to communicating the results of the quantification of greenhouse gas (GHG) emissions, their removals and the Carbon Neutrality of products and organisations.

The programme is based on internationally recognised standards and grants for use several different dedicated marks for the communication of GHG emission or reduction values.

7.1 Carbon Footprint of Product

The *Carbon Footprint of Product* (CFP) is the quantification of greenhouse gases (GHG) emissions calculated on the basis of the methodology of the *Life Cycle Assessment* (LCA). In the quantification of the CFP, the emissions related to the extraction and transformation of raw materials are therefore generally considered, as well as those related to production, transport, use and final disposal of a product.

The possible exclusions of some of these life cycle stages are described in the pertinent PCRs.



The recognised standard regulating this branch of the programme is:

- ISO 14067:2018 - Greenhouse gases - Carbon footprint of products - Requirements and guidelines for quantification.

The registration of a product within the "CFP" section allows the use of the following mark:



In case of availability of a conformity statement to the CFP Systematic Approach, it will be possible to directly register each product included within the scope of such statement.

7.1.1 PCR

With regard to CFP registrations, the requirements described in the *Product Category Rules (PCR)* concerning the interested category of products are to be followed during the calculation of the carbon footprint, in addition to those defined in the ISO 14067.

PCRs are necessary to ensure the uniformity of methodological approaches followed to perform CFP studies, and to allow comparability between CFP studies related to products in the same category. The PCRs shall be developed in accordance with ISO/TS 14027:2017 and be recognised within the CFI *Programme Operator*, according to the regulations defined by the Scientific Technical Committee (CTS).

The CFI *Programme Operator* can realise collaboration agreements with other *Programme Operators*, in order to extend the mutual recognition of each other's PCRs.

The PCR development process is described in the "PCR Development" procedure.

Further information regarding the PCRs recognised by the CFI is available in the "PCR" section in the CFI website www.carbonfootprintitaly.it/en/.



7.2 Organisation' GHG Inventory

The GHG inventories envisage the quantification and the reporting of direct and significant indirect GHG emissions. The new regulatory approach led to the extension of the previous three "Scopes" into six GHG emission "Categories".

The categories and sub-categories of GHG emissions that have to be considered during the development of the GHG inventory are the following:

1. Direct GHG emissions and removals:
 - 1.1. from stationary combustion;
 - 1.2. from mobile combustion;
 - 1.3. process emissions;
 - 1.4. fugitive emissions;
 - 1.5. from land use, land use change and forestry (LULUCF).
2. Indirect GHG emissions from imported energy:
 - 2.1. indirect emissions from imported electricity;
 - 2.2. indirect emissions from imported energy.
3. Indirect GHG emissions from transportation:
 - 3.1. from upstream transport and distribution for goods;
 - 3.2. from downstream transport and distribution for goods;
 - 3.3. from employees commuting;
 - 3.4. from client and visitor transport;
 - 3.5. from business travels;
4. Indirect GHG emissions from products used by the organisation:
 - 4.1. from purchased goods;
 - 4.2. from capital goods;
 - 4.3. from the disposal of solid and liquid waste;
 - 4.4. from the use of assets;
 - 4.5. from the use of services that are not described in the above subcategories.
5. Indirect GHG emissions associated with the use of products from the organisation:
 - 5.1. from the use stage of the product;
 - 5.2. from downstream of leased assets;
 - 5.3. from end of life stage of the product;
 - 5.4. from investments.
6. Indirect GHG emissions from other sources.



According to the voluntary standards requirements, the organisation shall document the pathway followed to determine which indirect emissions are included in the GHG inventory. In addition, the exclusion of significant indirect emissions shall be justified.

Within the CFI programme it is also required to specify the used primary and secondary data, and their impact on the whole GHG inventory's value.

A model of Inventory Report (RIN01-0-GHG inventory report summary table), recognised as compliant with the requirements of the ISO 14064-1 by the CFI programme, can be found, in the section "CFI Documents" on the website www.carbonfootprintitaly.it/en/.

The recognised standard for this section of the programme is:

- ISO 14064-1:2018 - Greenhouse gases - Part 1: Specification with guidance at the organisation level for quantification and reporting of greenhouse gas emissions and removals.

Because of the recent publication of the ISO 14064-1:2018 standard, until the 31st December 2021, for the organisations that developed their inventory in accordance with ISO 14064-1:2006 it will still be possible to request the registration according to that version of the standard. After the 31st December 2021, it will only be possible to register GHG inventories developed in accordance with ISO 14064-1:2018.



The registration of an organisation within the "CFO" section allows the use of the following mark:



7.3 Carbon Reduction

Carbon Reduction attests GHG emission reductions supported by accredited independent third-party verification statement. These concerns both CFP and GHG inventories of organisations, through direct mitigation interventions within the system boundaries of the related studies.

The participation in Carbon Reduction shall be supported by two different verification statements related to GHG emissions quantified one year apart.

The mitigation measures shall be described and communicated in order to support the fact that the emissions reduction is actually due to specific mitigation measures, and not to a fluctuation of normal operating conditions.

The term mitigation therefore refers to all the measures adopted by the company to reduce the CFP, for example: the introduction of more efficient machinery or plants, different product design choices, the change of suppliers, the change of energy source, etc.

The registration of a product within the "Carbon Reduction - product" and "Carbon Reduction - organisation" section allows for the use of the following mark:



The membership of Carbon Reduction of organisation is also open to companies that fall within the scope of the EU ETS Regulation, the European GHG Emission Trading Scheme introduced and regulated in the European legislation by Directive 2003/87/EC and subsequent amendments.



For what concerns the organisations that fall within the scope of EU ETS Regulation, their registration to Carbon Reduction must be supported by two different ETS communications issued by an accredited third-party body at least one year apart. Therefore, CFI will not perform any further verification.

In this case, only the direct GHG emissions of the organisation are accounted for and the mitigation measures must be, as well as for the previous cases, supported by two different ETS communications.

If the organisation sets a GHG emissions reduction target, the following information shall be specified and reported:

- period covered by the target, including the target reference year and the target completion year;
- type of target (intensity or absolute);
- category of emissions included in the target;
- the amount of reduction and its unit expressed in accordance with the type of target.

7.4 Carbon Neutrality

Carbon Neutrality is the certification that an organization or a product has achieved "net zero" GHG emissions in a given period, through mitigation actions and the purchase of recognised carbon credits.

This approach requires compliance with the requirements of ISO 14068-1:2023 (Greenhouse gas management and climate change management and related activities — Carbon neutrality), and on a transitory basis, of PAS 2060:2014 (Specification for the demonstration of carbon neutrality) or with standards recognized as equivalent by the CFI programme, and, in particular for registration purposes, the fulfilment of the following steps:

1. The determination of the subject, product or organization, of the intended claim of carbon neutrality.
2. The identification of a carbon neutrality pathways, in which are established the long-term target to achieve the carbon neutrality of the subject, and the redaction of a signed commitment declaration to carbon neutrality.
3. The possession of CFO or CFP registration in CFI according with the following standards:
 - ISO 14064-1 in the case of an organization,
 - ISO 14067 if it is a product or service.
3. The adoption of GHG reduction and/or GHG removal enhancement targets.
4. Offsetting of unabated GHG emissions with credits from projects recognised by CFI.



The credits shall come from programs and associated to project that really reduce GHG emissions or increase their removals, recognised by the CFI programme on the basis of ISO 14068-1 requirements. The list of programs recognized by CFI is available in the "How to participate/Carbon Neutrality Requirements" section of the website www.carbonfootprintitaly.it/en/.

The emissions to reduce and offset are those relative to:

- the GHG inventory data in the reference year registered in CFI (for an organisation);
- the value of CFP of the product in the reference year registered in CFI multiplied for its annual production (for a product).

The registration of a product/organization in the "Carbon Neutrality" section in CFI identifies the reference year of the offset emissions and allows the use of the following mark for one year (understood as 365 days):



Exclusively in the transitional period of PAS 2060:2014 application, CFI reports that it exceptionally allows the registration of Carbon Neutrality of entities that adopt future commitments to reduce emissions ("commitments") and offset emissions only through the purchase of credits recognized and without achieving the reduction objectives. The credits must come from programs to reduce GHG emissions or increase their removal recognized by the CFI program.

The emissions to be compensated are those relating to the production data for the year subject to the quantification of GHG emissions.

8. HOW TO PARTECIPATE IN THE CFI PROGRAMME

To participate in the CFI programme, it is necessary to present a verification statement of an independent third-party, released accordingly to ISO 14064-3 in an accreditation schemes compliance with ISO 14065.



These verification activities must relate to specific rules for CFP and GHG inventories (see par. 7.1 and 7.2), respectively for product and organization, and for Carbon Neutrality (see par. 7.4).

For the registration to *Carbon Reduction*, also requires to own two different verification statements obtained at different times, able to demonstrate the effective reduction of emissions. The participation in *Carbon Reduction* shall be supported by the description of the mitigation measures implemented by the organisation, which will be made public within *Carbon Reduction's* product or organisation data sheet.

For Carbon Neutrality it will be necessary to add to the verification of the emissions of the product or organisation, mentioned above, the validation of any "commitments" or the validation of the "claims", indicated in ISO 14068-1.

In addition, it must be verified from an AUP perspective that the credits obtained from the GHG emissions reduction projects used for the offsets fall within those eligible for the CFI programme and are such as to offset the emissions quantified in the reference year of the CFP or of the GHG Inventory and not covered by the reduction projects.

To participate in the CFI programme it is necessary to fill in the registration form, differentiated by the various types of participation required, available after the creation of an account in the website at <https://www.carbonfootprintitaly.it/it/account/accedi/>.

The registration represents the emission values referred to a specific time period and therefore are carried out one-off, and no periodic surveillance activities are encompassed.

In order to avoid the presence of excessively obsolete information, the records are considered valid and kept on the website for a period of 3 years, except for the *Carbon Neutrality* registration which is valid for one year. After this period, they are automatically removed, and the registration expires.

Normally, 6 months before the registration deadline a communication is sent to the company, in order to allow them to plan the elimination of the use of the CFI mark in accordance with the established deadline.

If the verifier suspends or withdraws the verification statements supporting the registration to the CFI *Programme Operator*, the organisation shall inform the SGT.

Companies that register products or organisations in the CFI also have additional benefits, such as lower costs for participating seminars or training courses hosted by the CFI or affiliated with it.



8.1 Application for registration

The registration process, which applies to all parties wishing to register their products and organisations in accordance with the CFI programme, is described below.

It should be noted that the registration of a product or of an organisation in the CFI programme displays a figure of the GHG emissions referred to a precise moment of time, and therefore does not automatically require a periodic update.

The reference to the time frame of the information pertaining to the single registration is reported in the specific data sheets of the product or organisation analysed.

8.2 Registration requirements

In order to be able to register a product or an organisation within the CFI programme, the company shall have an independent third-party verification statement on the applicable standards, according to the type of registration required (e.g. ISO 14067, ISO 14064-1, EU ETS and ISO 14068-1, see par. 7.1, 7.2, 7.3 and 7.4).

The registration request must be supported by additional information as described in par. 8.3, which will be included on the CFI website www.carbonfootprintitaly.it/en/, as background information to support the registrations.

Registration will take place upon the SGT approval.

Specific requirements characterise the different types of registrations and are described in detail in the dedicated "CFI Registration" document.

8.3 Request for registration

In order to submit a registration request, it is necessary to create an access profile as a "New user" on the website at the link <https://www.carbonfootprintitaly.it/it/account/accedi/>, then, once you have generated your credentials (email and password), you can log in. At this point it will be possible to choose from the list on the left of the screen the section of interest (Organisations, Products, Carbon neutrality or Carbon reduction) and select the "Add" button. The relative registration form will open, to be filled in in its entirety, and finally sent.

The application has to be integrated with the following documents:

- verification statement in PDF format;
- picture of the product, organisation or intervention, in the case of CFP, GHG Inventory or Carbon Reduction, respectively;
- logo of the organization;



- "MOD01-0-Achieved targets" and "MOD02-0-Carbon offset" forms, just for Carbon Neutrality registrations;
- "Attestation for Carbon Neutrality" in order to certify the actions done to maintain the Carbon Neutrality status.

8.4 Registration costs

The registration fees are described in the "CFI Price list" document and apply from 1st January 2018.

The registration of the product or organisation will take place only after the regular payment of the established fee and the three years of registration (one year for Carbon Neutrality) on the CFI website will be valid from the date of inclusion on the site.

For the payment methods, refer to the "CFI Registration" procedure.

8.5 Publishing

Once the registration of the product/organisation data sheet has been approved, the SGT assigns the registration number and publishes it in the dedicated "CFI Register" section of the website www.carbonfootprintitaly.it/en/.

9. Requirements for the use of the CFI marks

9.1 General criteria

The use of the CFI mark is granted for products and organisations registered in the CFI *Programme Operator*.

The use of the CFI mark, according to the requirements described in detail in the "Mark's use Regulation" procedure, allows the possibility of affixing the CFI mark on business cards and on e-mails signature of personnel (employee or collaborators) of registered organisations, providing that it is combined with the word "REGISTERED".

A copy or sample of each document or object displaying the CFI mark shall be sent to the CFI.

The marks can be displayed with different sizes, adapting to the situations and type of support on which they are used, while ensuring the observance of the original proportions.



It is also possible to use the mark without the box in which the value of verified emissions is reported. In case of the type of mark reporting the specific emission values, the reference year(s) of the GHG emissions quantification/reduction has to be indicated.

The address of the CFI website (www.carbonfootprintitaly.it/en/), where the background information supporting the Carbon Footprints is available, shall also be reported.

The link to the specific sections of the website containing this information can also be communicated through the use of a QR (Quick Response) code, which will be provided by the CFI.

9.1.1 Marks related to products

It is allowed to directly use of the CFI mark on the registered products and/or on the related packaging material and on the technical file of the registered product, using the relevant mark typology for one of the three different registrations available for the product:

- *Carbon Footprint of product*
- *Carbon Reduction*
- *Carbon Neutrality*

The mark has to be affixed on the product and/or its packaging making sure that the mark clearly refers to the product and not to the manufacturer.

9.1.2 Mark related to organisations

An organisation can use the CFI mark ensuring that who carried out the GHG inventory and/or reduction actions is always clearly traceable.

The mark related to the organisations cannot be affixed to the product and/or its packaging, in order not to allow incorrect attribution of the GHG emission values to the related product.

It can instead be used on various documents (e.g., letterheads, technical, commercial, promotional or advertising documents, websites, envelopes and other information material), always taking care of clearly refer to the organisation.

The usable marks are in this case the two related to the organisations:

- Organisation' GHG inventory
- *Carbon Reduction*



- Carbon Neutrality

9.2 Cessation in the mark's use

In case of cessation of the CFI registration, the organisation's right to use the CFI marks is no longer valid. Temporary extensions of the use of marks may be agreed with the CFI *Programme Operator*, for a period not exceeding 12 months.

In addition, an organisation registered to the CFI *Programme Operator* who voluntarily decides to renounce the CFI registration is obliged to immediately suspend the use of the CFI mark(s).

9.3 Improper use of the mark

The violations of this Regulation by organisations registered in the CFI *Programme Operator* and the use of the CFI mark without registration, will imply necessary actions by the CFI in order to obtain adequate measures, in line with the current legislation.

10. COMPLAINTS MANAGEMENT

The CFI programme includes a complaint management system for stakeholders and appeals by registered product owners and organisations. The system is managed by the SGT. Complaints may be submitted by anyone interested in the activities of CFI through the procedures described in the dedicated procedure "CFI Complaints and appeals".

10.1 Complaints and appeals

The CFI SGT can receive complaints:

- o on the CFI operation;
- o on the registrations in the CFI.

The owner and the applicants of the registration in the CFI can present a justified appeal against CFI decisions.

Complaints and appeals must be sent via email to info@carbonfootprintitaly.it. Complaints/appeals will not be accepted if anonymously or orally forwarded.



The management of the complaints and appeals has to be tackled by the SGT. When possible, it will be ensured that the responsible of these tasks are not involved in the activities under analysis of the complaint/appeal. When potentially serious issues are identified by the SGT, the DIR can be involved.

The SGT will undertake all the necessary actions to evaluate the complaint consistency and, if necessary, to solve it. In case this process allows to identify substantial deficiencies of CFI, SGT will start a proper internal non-compliance procedure (NC).

All complaints/appeals will be considered solved only after the transmission of a formal response to who presented the complaint/appeal under analysis.

The management of complaints/appeals is communicated to the ORP during the following meeting.

The list of solved complaints/appeals will be transmitted on an annual basis to the DIR for a proper evaluation.

Please refer to "Complaints and Appeals" procedure, for any further details.

11. DATA CONFIDENTIALITY

The information managed by the CFI programme are usually limited to the ones published on the website and are then to be considered public. Any other information the CFI should receive is handled confidentially.

The CFI *Programme Operator* will communicate to all interested parties all the information in its possession, according to law requirements.

12. THE VERIFICATION BODIES

12.1 Procedure for verifying the competence of verifiers

The CFI *Programme Operator*, in agreement with the stakeholders represented by the ORP, has the right to define the minimum competence requirements for the verifiers or specific requirements to conduct GHG verification activities, in order to maintain the programme reliability and integrity.

12.2 Additional rules for the verification of GHG emissions

The recent publication of ISO 14064-3:2019 and of ISO 14065:2020 opens new scenarios for GHG emissions verification, focusing on the assurance aspects of verified data. In fact, after the four years



transition period provided by IAF for ISO 14064-3:2019 and the three years provided instead for ISO 14065:2020, these assurance aspects will be binding for all the verification activities.

In order to facilitate the transition of the new ISO 14064-3:2019 at the market level, and to provide a clear interpretative approach of this standard, the DIR has decided to anticipate the implementation of some key requirements of the standard in its Regulation.

At the moment, those requirements are to be implemented voluntary basis. This Regulation, in fact, considers a transition phase until April 2021: two years before the definitive entry into force of ISO 14064-3.

It is important to highlight that for the verification of the CFP (ISO 14067) and of the GHG inventory of organisations (ISO 14064-1), it is almost impossible to guarantee an assurance level on the global data. In fact, data of the CFP or the GHG inventory are generally the results of diverse inputs that are characterized by different data quality. Data relating to “core” processes are usually characterized by a high quality due to the direct measurements of the activities under study. However, data relating to “upstream” or “downstream” processes are collected from generic databases and are therefore not strictly representative of the specific activities. This implies that in those cases, theoretically, it would only be possible to guarantee on the inputs characterized by high quality data, while for the remaining inputs the verifier will only be able to confirm what was verified on-site, by following specific rules defined in other additional documents, such as the PCRs. The confirmation of the verified data is performed by following the approach specified in a new standard that is called AUP (agreed-upon-procedure).

In accordance with ISO 14064-3:2019 and ISO 14065:2020 this is equal to perform a so-called “mixed-engagement”, that represents an integrated approach between a real verification and an AUP. The first activity leads to the confirmation of a certain assurance for a specific part of the verified GHG value, while with the AUP the verifier can only confirm the correct application of the procedures and methodologies identified and adopted by the organisation. In this way, the verifier will confirm the global value, by diversifying the part of the total contribution covered by assurance from the one verified with the AUP.

Below, an example of how the part of the opinion relating to the verification itself could be described, according to the “*report of factual finding*” related to the AUP:

- Opinion: on (date) xxx an AUP verification has been performed by xxxx at the facility xxx to verify the CFP of the product xxx. On the basis of the information made available during the



verification, the verifying team, that has operated in accordance with ISO 14064-3, is able to express an opinion regarding the evidence provided by the organisation. Our data collection activity has been performed in accordance with the following procedures/methods...

It is confirmed that the data analysed during the verification were historical data. It is our opinion that the data xxx relating to the CFP of the product xxxx have been represented correctly, without material discrepancies.

- *Report of factual finding: on (date) xxx an AUP verification has been performed by xxxx at the facility xxx to verify the CFP of the product xxx. The part of the verification covered by an AUP activity was related to the single "upstream" emissions, that have been verified in accordance with the PCR xxxx. In particular, it has been verified that, in accordance with the mentioned document, the collected data and their allocation were performed according to the indications of the PCR itself. After the AUP activity it can be confirmed that:*
 - o *The data relating the raw materials xxx have been collected in accordance with the requirements of the PCR xxxx;*
 - o *....*



13. REVISION PERIOD OF THE REGULATION

The present Regulation can be downloaded in the "CFI Documents" section of the website www.carbonfootprintitaly.it/en/ where it will always be present its most updated version.

The Regulation is expected to be reviewed every two years from the date of the last revision, in order to confirm its validity or to start a revision process.