

VERIFICATION BODY CONFLICT OF INTEREST

PART I: VERIFICATION BODY INFORMATION

Verification Body Name:	Emissions Data Year:
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PART II: REPORTING ENTITY INFORMATION

Reporting Entity Name:	CARB Identification Number:
Contact Name:	Telephone Number:

Email Address:

Describe how you evaluated the scope of the COI review, including the Reporting Entity's Operational Control and its Related Entities. See instructions. Include additional COI reviews required if the reporting entity is utilizing a separate contracting entity to engage verification services.

Is a sector accreditation required?

No

Process Emissions

Oil and Gas Systems

Transactions

PART III: COI SELF-EVALUATION

Based on my assessment, I believe my verification body's risk for a conflict of interest is:

HIGH

MEDIUM

LOW

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PART IV: ATTACHMENTS

Organization Chart and Business Description: Please attach an organization chart of your verification body and any entities related to your verification body. Only submit once per year, unless changes occur. <input type="checkbox"/> Attached <input type="checkbox"/> Already Submitted
Conflict of Interest Mitigation Plan, if applicable. <input type="checkbox"/> Attached

PART V: VERIFICATION TEAM

Provide the following information for each member of the verification team and the independent review. Attach additional pages as necessary.

Lead Verifier Name:	
<input type="checkbox"/> Process Emissions Specialist	<input type="checkbox"/> Oil and Gas Systems Specialist
<input type="checkbox"/> Transactions Specialist	Attend Site Visit? <input type="checkbox"/> Yes <input type="checkbox"/> No

Independent Reviewer Name:

Other Name:	
<input type="checkbox"/> Process Emissions Specialist	<input type="checkbox"/> Oil and Gas Systems Specialist
<input type="checkbox"/> Transactions Specialist	Attend Site Visit? <input type="checkbox"/> Yes <input type="checkbox"/> No
Describe roles and responsibilities during this verification service:	

Other Name:	
<input type="checkbox"/> Process Emissions Specialist	<input type="checkbox"/> Oil and Gas Systems Specialist
<input type="checkbox"/> Transactions Specialist	Attend Site Visit? <input type="checkbox"/> Yes <input type="checkbox"/> No
Describe roles and responsibilities during this verification service:	

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PART VI: RELATIONSHIP OF VERIFICATION BODY TO THE REPORTING FACILITY

Have the verification body and reporting entity shared any management staff or board of directors membership, or has any of the senior management staff of the reporting entity been employed by your verification body, or vice versa, within the last five years? Yes No

If yes, please explain:

Name:	Verification Body Position Title:	Reporting Entity Position Title:
Dates of Overlap (month/year):	Date From:	Date To:

List any personal or family relationships between the employees or management of the reporting entity and any members of the verification body, including subcontractors of the verification body who are members of the verification team:

Has any staff member of the verification body provided any type of non-monetary incentive to the reporting entity to secure this verification services contract? Yes No

If yes, please explain:

PART VII: PAST SERVICES

Has any employee of the verification body or a related entity, or subcontractor who is a member of the verification team, provided any of the following services to the reporting entity within the previous five years? See instructions on for the definition of "member."

<input type="checkbox"/> Yes <input type="checkbox"/> No	Designing, developing, implementing, reviewing, or maintaining an inventory or information or data management system for facility air emissions, or, where applicable, electricity or fuel transactions, unless the review was part of providing greenhouse gas verification services.
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<input type="checkbox"/> Yes <input type="checkbox"/> No	Developing greenhouse gas emission factors or other greenhouse gas-related engineering analysis, including developing or reviewing a California Environmental Quality Act (CEQA) greenhouse gas analysis that includes facility specific information.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Designing energy efficiency, renewable power, or other projects which explicitly identify greenhouse gas reductions as a benefit.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Designing, developing, implementing, conducting an internal audit, consulting, or maintaining a GHG emissions reduction or GHG removal offset project as defined in the cap-and-trade regulation.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Owning, buying, selling, trading, or retiring shares, stocks, or emissions reduction credits from an offset project that was developed by or resulting reduction credits are owned by the reporting entity.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Dealing in or being a promoter of credits on behalf of an offset project operator or authorized project designee where the credits are owned by or the offset project was developed by the reporting entity.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Preparing or producing greenhouse gas-related manuals, handbooks, or procedures specifically for the reporting entity.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Appraisal services of carbon or greenhouse gas liabilities or assets.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Brokering in, advising on, or assisting in any way in carbon or greenhouse gas-related markets.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Directly managing any health, environment or safety functions for the reporting entity.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Bookkeeping or other services related to accounting records or financial statements.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Any service related to development of information systems, including consulting on the development of environmental management systems such as those conforming to ISO 14001 or energy management systems such as those conforming to ISO 50001, unless those systems will not be part of the verification process.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Appraisal and valuation services, both tangible and intangible.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Fairness opinions and contribution-in-kind reports in which the verification body has provided its opinion on the adequacy of consideration in a transaction, unless the resulting services will not be part of the verification process.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Any actuarially oriented advisory service involving the determination of amounts recorded in financial statements and related accounts.

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<input type="checkbox"/> Yes <input type="checkbox"/> No	Any internal audit service that has been outsourced by the reporting entity or offset project operator that relates to the reporting entity's internal accounting controls, financial systems or financial statements, unless the result of those services will not be part of the verification process.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Acting as a broker-dealer (registered or unregistered), promoter or underwriter on behalf of the reporting entity.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Any legal services.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Expert services to the reporting entity, a trade or membership group to which the reporting entity belongs, or a legal representative for the purpose of advocating the reporting entity's interests in litigation or in a regulatory or administrative proceeding or investigation.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Verification services that are not conducted in under impartiality provisions substantively equivalent to §95133, unless the systems and data reviewed during those services, as well as the result of those services, will not be part of the verification process.

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PART VIII: OTHER SERVICES

1. Has any member of the verification team, verification body, or a related entity engaged in services of any nature, other than CARB verification services, with the reporting entity, or related entities in the last five years? Yes No
2. If yes, provide the following information for each person and instance. Include current work and any future work arrangement/contracts as well as non-CARB verification. Attach extra sheets if needed.

Date of Service (mm/yy to mm/yy)	Name of Each Person Providing Service	Description and Location of Service. Identify A, B, or C from the list below	For each non-CARB verification service, were services conducted under impartiality provisions substantively equivalent to §95133?	*If disclosing COI risk as "LOW", enter the fee in U.S. dollars for each item listed
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	

- A. Third-party services other than CARB verification services for the reporting entity including other locations under the same operational control; or
- B. Consulting services for the reporting entity including other locations under the same operational control; or
- C. Any services for a related entity under separate operational control, which is being disclosed to CARB but not required to be included in the evaluations of high or low risk services.

*Not required if disclosing COI risk as MEDIUM.

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3. From the list of services in Part VIII, Question 1 above, enter the sum of fees only for those services provided by any member of the verification body or verification team to the REPORTING ENTITY, which includes other locations under shared operational control.

Exclude fees for services to related entities under separate operational control ("C" services), CARB verification services, and any other verifications that were conducted under impartiality provisions substantively equivalent to §95133 ("A" services).

Sum of "B" services from above:

4. Is this value less than 20% of the fee for the proposed verification? Yes No

If these services are valued at 20 percent or more of the fee for the proposed verification services for the reporting entity, submit a plan to avoid, neutralize, or mitigate the medium potential COI situation. The plan should explain how the amount and nature of work previously performed is such that any verification team member's credibility and lack of bias should not be under question.

PART IX: CARB VERIFICATION SERVICES

Has any member of your verification team, verification body, or related entities provided CARB verification services for the reporting entity or related entities within the past six years?

Yes No

If yes, please provide the following information for each instance. See §95130(a)(3) for a description of the required three-year break after a different verification body has recently provided verification services. If this is a 7th verification within the six-year allowed time period, clearly identify that below.

Name(s)	Describe Verification Services Provided	Dates of Service (mm/yy to mm/yy)

PART X: OTHER CONFLICT OF INTEREST CIRCUMSTANCES

Identify any other circumstances known to your verification body that could result in a conflict of interest:

PART XI: VERIFICATION BODY AUTHORIZATION

In signing this form, I certify under penalty of perjury under the laws of the State of California the information provided in this Conflict of Interest submittal is true, accurate and complete. I further certify that I am duly authorized to represent and legally bind the verification body on all matters related to this form.

Name:	Signature:	Date:
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INSTRUCTIONS

Complete this form on your computer, then print, sign and scan form. The completed, signed form and all supporting documentation should be emailed to ghgverify@arb.ca.gov. In the email subject line, please indicate: what is being submitted (Form A, B, AB), the Facility ARB ID, and the year of the emissions data report (2019), (e.g., Subject: AB-100012-2019). This form is available from the ARB website at: <https://ww2.arb.ca.gov/verification>.

The ISD/PPMB-001, Verification Body Conflict of Interest, and ISD/PPMB-002 Notice of Verification Services For Greenhouse Gas Emissions Data Reports must be submitted prior to beginning verification services.

The current version of this form is provided on the MRR verification website and may be used by verification bodies to provide the required information for CARB review.

A single form may be submitted for multiple reporting entities, provided that all other information submitted is the same for all reporting entities listed. Additional submittals may be necessary if an individual person or company is hired by the reporting entity to contract with the verification body on behalf of the reporting entity, pursuant to §95130(a).

This form may also be used to assess emerging potential for COI during verification services and for a period of one year after the completion of verification services.

You may submit the ISD/PPMB-001 and ISD/PPMB-002 jointly or sequentially. Please respond fully and in detail to all questions. If you have no prior relationship to the reporting entity (operator, supplier, electric power entity), you may answer “no” or “does not apply,” but you must answer every question. Attach extra pages as necessary.

USE OF SUBCONTRACTORS

Provide information for all subcontractors retained to complete the listed verifications, if applicable.

HOW TO SUBMIT FORM

Joint Submittal of ISD/PPMB-001 and ISD/PPMB-002: When both forms are submitted together, CARB staff will expedite the review. If CARB cannot complete the review to accommodate your proposed date to commence services, the commencement date will need to be adjusted. The verification body will be notified of the conflict of interest determination. If the potential conflict of interest is deemed acceptable, the verification body may proceed with verification services.

Sequential Submittal of ISD/PPMB-001 and ISD/PPMB-002: After deeming the information in ISD/PPMB-001 is complete, CARB staff will determine if the verification body’s potential for conflict of interest is acceptable. CARB will notify the verification body of the conflict of interest determination.

The ISD/PPMB-002 must be provided to CARB 14 days prior to commencing verification services after the potential for conflict of interest is deemed acceptable.

Completed forms and all supporting documentation should be emailed to ghgverify@arb.ca.gov.

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PART I: VERIFICATION BODY INFORMATION

Enter contact information for the verification body and the emissions data year.

PART II. REPORTING ENTITY INFORMATION

Enter contact information for the reporting entity for which your verification body intends to perform verification services.

Describe how you evaluated the scope of the COI review, including the Reporting Entity's Operational Control and its Related Entities. The Reporting Entity's Operational Control, as defined in §95102(a), must be delineated to ensure that all prior, current, and emerging services provided to the Reporting Entity have been evaluated for potential COI. For example, if the authority to introduce and implement operating, environmental, health and safety policies is held at the corporate level, all services provided to the parent corporation must be reviewed, not just those projects that are pertinent to the specific facility, supplier, or electric power entity operations. In addition, services provided to the corporate parent company and its related entities must be disclosed. "Related entity" means any direct parent company, direct subsidiary, or sister company. This may include an organization chart or other description of the Reporting Entity.

If the ownership and operational control structure is not clear, please request clarification from the reporting entity and then contact CARB with the information you have compiled. CARB staff will assist in determining the required scope of COI evaluation.

Additional submittals are necessary, pursuant to §95130(a), if an individual person or company is hired by the reporting entity to contract with the verification body on behalf of the reporting entity. If applicable, submit an additional COI assessment substituting "contracting entity" for "reporting entity." Also provide a signed COI assessment from the contracting entity demonstrating COI review between itself and the reporting entity. This form may be used by the contracting entity substituting "contracting entity" for verification body.

Indicate sector accreditation(s) required for the verification, if applicable. For example, verification of a petroleum refinery that also supplies CO₂ requires both an oil and gas specialist and a transactions specialist. If you are unsure if an accredited sector specialist is required, please ask for more information from CARB staff before submitting this form.

PART III. CONFLICT OF INTEREST SELF-EVALUATION

After reviewing this document, complete this self-evaluation. If the potential COI is high, your verification body will not be able to perform verification services for this facility. If the potential COI is medium, you **MUST** attach a mitigation plan to this COI form.

Be aware that the six year period for assessing potential for high conflict of interest begins on the date the reporting entity first contracted for any third-party verifications, validations, or audits under any protocols, including CARB verification services, for the scope of activities or operations under the CARB identification number for the emissions data report, and ends on the date the final verification statement is submitted. Even if these services are provided before the verification body or verifiers have received CARB accreditation, the six year period still begins when these services are contracted for, if accreditation is later received. The six year limit also applies to verification bodies and verifiers providing CARB or any other third-party verifications, validations, or audits that include the scope of

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activities or operations under the CARB identification number for the emissions data report and does not reset upon a change in reporting entity ownership or operational control. For example, if the verification body provided verification services for a 2009 emissions data report beginning June 30, 2010, the verification body must not continue to provide verification services for the same reporting entity or operations after June 30, 2016, unless a three-year break occurred during that timeframe.

PART IV. ATTACHMENTS

- Required to be submitted once per year, unless changes occur: an organizational chart of your verification body and any entities related to your verification body. Include a brief description of the primary nature of the work performed by your verification body and any entities related to your verification body.
- Required only if Medium Potential for Conflict is stipulated. A mitigation plan is a demonstration by the body that any individual who may be conflicted with the reporting entity to be verified is isolated from verification services. Medium conflict generally occurs between two individuals (one at the verification body and one at the facility) or between an individual and an organization. The mitigation plan should address §95133(d) and §95133(e)(1)(C)3, including:
 - A demonstration that any individuals (in the verification body, on the verification team, or subcontractors) with potential conflicts have been removed or insulated from the project.
 - An explanation of any changes to the verification body or verification team to remove the potential conflict of interest. Include organizational structure changes.
 - If applicable, the plan should explain how the amount and nature of work previously performed is such that any member of the verification team's credibility and lack of bias should not be under question.

Note: It is important to disclose all possible business or personal relationships that may introduce conflict. Should any conflicts come to light at a later date, the verification body would be subject to liability with the possibility of losing their status as a verification body. Likewise, a verifier may be subject to revocation of their accreditation. Consequences to the reporting entity include the possibility of having their verification statement set-aside, which would require a re-verification for the reporting year(s) the conflicted individual(s) participated in their verification. The same is true for undisclosed subcontractor conflict. The verification body must fully investigate subcontractor conflict, because the verification body bears the responsibility for the COI self-evaluation.

PART V. VERIFICATION TEAM

Indicate the number of individuals that will comprise the verification team. At minimum, this must consist of a lead verifier and independent reviewer. However, in the case that a specialty sector is being verified (process emissions, oil and gas systems, or transactions), a sector specialist must also be on the team and conduct the site visit. A technical expert may also be a part of the team (e.g., a refinery expert), as long as they do not perform verification services and are listed on the form.

PART VI. RELATIONSHIP OF VERIFICATION BODY TO THE REPORTING ENTITY

Please indicate if there is any shared management staff or board of director's membership between the verification body and the reporting entity within the last five years. If you answered yes, please disclose the names and information of the individuals affected.

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Provide a list of any personal or family relationships between the staff and management of the reporting entity and any members of the verification body. If no personal or family relationships exist, answer “none.”

Indicate if any staff member of the verification body has provided a non-monetary incentive to the reporting entity to secure this verification services contract.

PART VII. PAST SERVICES

If you answer “yes” to any of the questions in this section, your conflict is deemed “HIGH” and your verification body will not be allowed to continue with verification services for this reporting entity.

Note: “Member” for the purposes of this section means any employee or subcontractor of the verification body or related entities of the verification body. “Member” also includes any individual with majority equity share in the verification body or its related entities. “Related entity” for the purposes of this section means any direct parent company, direct subsidiary, or sister company.

PART VIII. OTHER SERVICES

Please indicate whether a member of the verification team, verification body, or related entity provided any services, other than CARB verification services, within or outside California, for the reporting entity or related entities in the last five years. If so, provide details for each individual affected, date and location of the services, and the fees associated with those services. Provide a detailed description of the service provided, including distinguishing between A, B, and C services if necessary to clarify the type of services provided.

Include any work performed in the last five years, current work or any work you intend to perform. Include verification services for GHG emissions verification provided outside the jurisdiction of CARB. For each non-CARB verification, state if the service was conducted under impartiality provisions substantively equivalent to §95133 and include the fee for each service. You may use a separate attachment for this information.

From the services provided in #1 of Part VIII, calculate the total fee for those services that were provided directly to the reporting entity, or for a related entity with shared operational control (“B” services). Do not include services to a related entity under separate operational control (“C” services). Do not include CARB verification services or other verification services that were conducted under impartiality provisions substantively equivalent to §95133. If this fee is valued at 20 percent or more of the fee for the proposed verification services, please submit a plan to avoid, neutralize, or mitigate the medium potential for COI pursuant to §95133(d) and §95133(e)(1)(C)3.

The plan should explain how the amount and nature of work is such that any verification team member’s credibility and lack of bias should not be under question.