11/03/2025

Low Carbon Fuel Standard (LCFS)
Verifier Rotation Requirements
FAQ

The California Air Resources Board's (CARB) Low Carbon Fuel Standard (LCFS) regulation[1] is designed to reduce greenhouse gas emissions associated with the life cycle of transportation fuels used in California. Unlike the regulation itself, these Frequently Asked Questions (FAQ) do not have the force of law. They are not intended to and cannot establish requirements beyond those that are in the LCFS regulation, nor can they supplant, replace, or amend any of the legal requirements of the regulation. Conversely, any omission or truncation of regulatory requirements does not relieve entities of their legal obligation to fully comply with all requirements of the regulation.

1. What does the LCFS regulation require regarding verifier and verification body rotation, and when is rotation required?

Consistent with the rotation requirements in section 95500(g) of the LCFS regulation, an entity that is required to contract for validation or verification services may use the same verification body (VB) or individual verifier(s) to conduct multiple engagements over a period not to exceed six years.

This timeframe begins on the execution date of the entity's first contract for any validation or verification and ends on the date the final verification statement is submitted. The six-year limit does not reset upon a change in ownership or operational control of the entity required to contract for validation or verification services.

If the entity is required or elects to contract with another verification body or verifier(s), the entity may re-engage the previous verification body or verifier(s) only after three years, except for set-asides of a validation or verification statement as specified in section 95501. An entity required to contract for validation or verification services must, in time for the next verification, replace a verification body that has a suspended or revoked Executive Order pursuant to the Mandatory Greenhouse Gas Reporting Regulation (MRR) section 95132(d), which is incorporated by reference in LCFS section 95502(a).

2. Why is rotation required?

The integrity of the LCFS program relies on individual verifier and VB rotation with a meaningful break in between service before reengagement. This break is designed to:

- Ensure impartiality and maintain verifier independence that, if compromised, could adversely affect verification outcomes (e.g., pressure to submit a favorable verification statement);

[1] Title 17, California Code of Regulations, §95480-95503.

- Protect against conflict of interest that may arise due to long-term business relationships between verifiers and their clients;
- Provide a new set of eyes to review reported data;
- Reduce potential complacency arising from the comfort and familiarity a VB or verifier may develop toward a contracted entity after an extended period; and
- Encourage continuous high standards of attention to detail and professional skepticism.

3. Who is required to rotate?

Rotation is required on both a verification body and an individual verifier basis. That is, to comply with the VB rotation requirements, the regulated entity must select a new VB and be verified by a completely new verification team. Verifiers who change VBs are still subject to the same rotation timelines based on their LCFS verification client history.

4. If an entity contracts with the same verification body from year to year, do changes to the verification team require a three-year disengagement on an individual verifier basis?

No. So long as the entity maintains the same verification body within the six-year timeframe discussed above, the individual verifiers on the verification team may change without requiring a three-year disengagement on an individual verifier basis. For example, the verification body may use verifiers A, B, and C in 2021, and verifiers X, Y, and Z in 2022. This team change will not force verifiers A, B, and C to take a three-year break from verifying the entity, so long as they continue to work under the same verification body.

5. Should I delay submitting my conflict-of-interest self-assessment to maximize the amount of time we may engage with an entity before rotation is required?

No. Submitting the form late does not extend the six-year verification period, because the start of verification is based on when services were initiated, which is designated as "the execution date of the entity's first contract for any validation or verification" in section 95500(g). This may not align with the date the COI form was signed or submitted.

6. When can we provide verification services to an entity again after disengagement?

After disengaging with the entity, individual verifiers and VBs may resume verification for that entity only after three years from the date of the last submitted verification statement. For example, if a VB chooses to engage the entity for one or two years only, the VB must still wait three years before providing LCFS verification services to that entity again.

Set-Asides: There is one exception to the three-year break rule. If the break in service is due to a set-aside, which requires the entity to hire a new verification body to re-verify an application or report, the entity may still contract with its previous verification body after the set-aside is completed, provided that the six-year limit has not been reached. See example scenarios in Table 1 below.

7. On what basis should rotation be assessed?

Rotation is assessed at the level of the entity required to contract for verification services. These are the regulated entities subject to verification including fuel pathway applicants and holders, reporting entities responsible for quarterly fuel transactions, and project operators. In most cases, the entity required to obtain verification services is the company registered in the online LCFS data management system including LRT and AFP. The registered company is identified by its Company Name, Company ID, and/or Federal Employer Identification Number (FEIN), as applicable.

8. We plan to provide verification services to a new company, but we verified its facility within the past three years. Can we still perform verification services? How does rotation apply when a facility is associated with multiple companies in LCFS?

There are several possible scenarios where this situation may occur, such as when a registered intermediate facility (e.g., dairy farm) associates with more than one fuel production company (e.g., gas upgrading plant) to provide site specific data for more than one fuel pathway report. If you intend to provide verification services to a company whose facility may fall outside the allowed rotation period, please contact CARB at lcfsverify@arb.ca.gov as soon as possible, along with a proposed mitigation plan. CARB staff will conduct a detailed review of the reporting entity's relationships with its suppliers and facilities, including operational control, to ensure compliance.

9. How many reports, applications, and report types may we verify for a given company within a single six-year period?

There is no limit to the number or types of reports or applications that may be verified within the allowed period. However, after six years, the verification body must take a three-year break for all report types, even if some report types were not verified during the entire six-year period.

10. How does deferred verification affect the rotation timeline?

A deferral does not extend or reset the six-year rotation limit. So long as the entity does not contract with a new VB within those six years, deferral does not trigger a mandatory three-year break from the VB. See example scenarios in Table 1 below.

11. May an individual verifier perform verification services for the same entity for more than six years if that verifier changes verification bodies?

No. For a specific verifier, changing VBs does not extend or reset the six-year limit on verification services for an entity as to a specific verifier.

12. May an individual verifier who changes verification bodies still provide verification services to the same entity if the verifier has not yet exceeded the six-year rotation limit?

If there is no break in service: A verifier who changes verification bodies may continue verifying the same entity but must adhere to the six-year limit. Once a verifier reaches the maximum six years allowed, both ***the verifier and verification body*** must disengage from the entity for three years.

If there is a break in service: If a verifier changes VBs before the six-year limit for a given entity is reached, the new VB may provide six years of service to the same entity only in the case where that verifier is excluded – as part of a mitigation plan – from the verification team for a minimum of three years.

13. If a company has a change in operational control or ownership, how will this affect rotation requirements?

Changes in ownership or operational control of registered entities must be reported to CARB as required by LCFS section 95483.3, and do not extend or reset the rotation period. If you have questions about a specific situation, please contact lcfsverify@arb.ca.gov.

14. Our verification body or individual verifier unintentionally exceeded the six-year engagement or three-year disengagement limits. How do we rectify this?

Please contact lcfsverify@arb.ca.gov for guidance. A violation of the regulation may lead to a set-aside of the verification statement or administrative corrective actions for the verification body or verifier.

15. Can you provide some rotation examples?

Please refer to the following table and descriptions for examples of various rotation scenarios.

Table I. VB Rotation Examples

Scenario	Verification Services Start Date Feb 15 2021	Feb 15 2022	Feb 15 2023	Feb 15 2024	Feb 15 2025	Feb 15 2026	Feb 15 2027
6 Years	VB1	VB1	VB1	VB1	VB1	VB1	VB2
3-Yr Break	VB1	VB1	VB2	VB2	VB2	VB1	VB1
2-Yr Defer	VB1	Defer	Defer	VB1	Defer	Defer	VB2
1-Yr Defer	VB1	Defer	VB1	Defer	VB1	Defer	VB2
Entity Owner Change	VB1 Owner 1	VB1 Owner 1	VB1 Owner 1	VB1 Owner 1	VB1 Owner 2	VB1 Owner 2	VB2 Owner 2
Set-Aside – VB Changed	VB1	VB1	VB1	VB1 Set Aside / VB2 Reverified	VB2	VB2	VB2
Set-Aside – VB Retained	VB1	VB1	VB1	VB1 Set Aside / VB2 Reverified	VB1	VB1	VB3

Six Years of Verification: The first VB provided verification services for six years. Starting February 15, 2027, the VB must disengage from the entity for all LCFS report types for a minimum of three years.

Three-Year Break After Two Years of Verification: The first VB provided verification services for two years, then disengaged. The entity contracted with a new VB and may not reengage the first VB until February 15, 2026.

Two Years of Verification Deferral: The first VB provided verification services starting February 15, 2021. Verification was deferred in 2022, 2023, 2025, and 2026. A new VB must verify all previously unverified reports starting February 15, 2027.

One Year of Verification Deferral: The first VB provided verification services to the regulated entity starting February 15, 2021. Verification was deferred in 2022, 2024, and 2026. Starting February 15, 2027, a new VB must verify all previously unverified reports.

New Ownership: The entity's ownership changed in 2025. The six-year verification limit still applies, so the entity must contract with a new VB starting February 15, 2027.

Set-Aside with Change in VB: The first VB provided four years of verification services and submitted a positive or qualified positive statement in 2024. Later that year, a significant error was found. CARB set aside the report for corrections and required a second VB to reverify the data. The entity continued verification with the new VB. The first VB may reengage the entity after three years.

Set-Aside with Retention of VB: The first VB provided four years of verification services starting February 15, 2021, and submitted a positive or qualified positive statement in 2024. A significant error was later found, and CARB set aside the report for corrections, requiring a second VB to reverify the data. The entity continued verification with its first VB and must rotate VBs by February 15, 2027.

If you have any additional questions regarding VB or verifier rotation, please contact CARB LCFS verification staff at lcfsverify@arb.ca.gov.