

## **Frequently Asked Questions Regarding Accreditation Requirements for Verifiers for California's Mandatory GHG Reporting Program**

This FAQ document is divided into two sections. The [first section](#) is for individuals who are not yet accredited to provide verification services under the Mandatory Reporting Regulation for GHG emissions (MRR). The [second section](#) is for currently accredited verifiers who are interested in becoming lead verifiers, adding sector accreditations, or forming a new verification body.

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### **FAQs for verifiers interested in future accreditation opportunities**

#### **1. Who can conduct verification services for greenhouse gas (GHG) emissions data reports under California's Regulation for the Mandatory Reporting of GHG emissions (MRR)?**

Only California Air Resources Board (CARB)-accredited verifiers can provide verification services for reporting entities subject to mandatory reporting. Verifiers are subject to specific requirements that include prescreening for education and professional experience, and CARB training. Verifiers work in teams, under the auspices of CARB-accredited verification bodies (companies and air districts that meet specific accreditation requirements), that submit verification statements to CARB. All applicants must complete CARB-approved verification training and pass an exit exam. CARB does not recognize accreditation from other GHG programs.

#### **2. When will the next MRR accreditation training be offered?**

CARB completed an MRR verification accreditation training in November 2020, with more than 70 prospective verifiers in (remote) attendance. Staff will offer training again in February 2024, including general verifier training, as well as transactions, and oil and gas specialties. Future training for the process emissions sector is still being considered. The deadline for submitting an application is December 15, 2023. Following the February 2024 training, the timing of future training opportunities will depend on verifier interest and program needs but will not likely occur until 2027 or after.

#### **3. Who can apply for accreditation as a verifier?**

Due to high demand, staff expects to need to limit enrollment. Priority enrollment will be granted to: 1) employees of existing verification bodies, 2) applicants who are interested in becoming accredited as part of a new verification body under MRR, 3) verifiers accredited under the CARB Low Carbon Fuel Standard (LCFS) Program who seek to be accredited as Oil and Gas sector specialists to provide verification services under LCFS (see FAQ #13), and 4) sub-contractors who have previously provided verification

services and/or who can provide a letter from a currently-accredited verification body documenting the verification body's intention to utilize the applicant as a subcontractor in the future.

**4. I am interested in future MRR verifier accreditation opportunities. Can you add me to your interest list?**

When the next MRR verifier accreditation training is scheduled, staff will reach out to currently-accredited verifiers and encourage them to circulate the invitation to their colleagues. If you are not currently employed by an MRR or LCFS-accredited verification body, send an email to [ghgverify@arb.ca.gov](mailto:ghgverify@arb.ca.gov) and we will add you to our interest list. Please keep in mind, however, that enrollment in the next training will be based on the priorities listed in FAQ #3.

**5. What is the format and location for the next training?**

Verifier training in November 2020 was held remotely due to Covid-19, while prior trainings were held in person, usually in Sacramento. February 2024 training will also be held remotely. At this time, the format for future trainings has not been determined. The format of future trainings will be informed by health department guidance in response to COVID-19.

**6. What is the cost for training and testing?**

Accreditation training and testing are provided at no cost. There are no fees for verifiers or verification bodies.

**7. What are sector specific verifiers and how are they accredited?**

In addition to verifier training for general and lead verifiers, CARB also offers sector specific training and accredits specialists for transactions, oil and gas, and process emissions. Reporting entities in these sectors have high emissions, rigorous fuel test requirements, or other complexities that require verifiers to have specific knowledge.

**8. What documentation of experience is necessary for sector accreditation?**

Work experience documentation for sector accreditation may include a list of related projects or job positions that show experience in the particular industrial sector – oil and gas industry, or fuels, or electricity transactions – including specific dates and job responsibilities that demonstrate two years of experience related to that sector as required by section 95132(b)(5)(A). If you are interested in gaining sector specific accreditation following the next MRR accreditation training, you should consider assisting on projects relevant to those sectors in the coming years.

## 9. What experience fulfills the requirement for lead verifier on the accreditation application form?

The requirements for a general (non-lead) verifier are listed in section 95132(b)(3), and include a combination of education and work experience. An existing verifier may qualify to upgrade to lead verifier if they have provided verification services for two years in at least three CARB verifications, as described in section 95132(b)(2)(B).

For new verifiers who wish to be accredited directly as lead verifiers, the regulation requires the applicant provide evidence that they have worked as a **project manager or lead person for not less than four years** (1) in the development of GHG or other air emissions inventories or (2) as a lead environmental data or financial auditor. Relevant graduate level work may count for up to two years towards this requirement.

- (1) A lead verifier is usually the project manager of a verification team. This requires the applicant to demonstrate leadership roles in preparing GHG or other air emissions inventories. Individuals who were solely responsible for the development of an inventory will be considered a project lead.
- (2) The second option requires the demonstration that the applicant was a lead environmental data or financial auditor.

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## FAQs for currently accredited verifiers and verification bodies

### 10. I am a CARB-accredited verifier. How do I upgrade to a lead verifier?

Fill out the [application](#), and check the "Lead Verifier" box. Submit the application and associated documentation to [ghgverify@arb.ca.gov](mailto:ghgverify@arb.ca.gov). You will receive an email confirming receipt and that your application is being processed and reviewed by CARB staff. If all the requirements have been successfully met, CARB will reissue your Executive Order indicating your lead verifier qualification. You are not required to attend additional training to be upgraded to lead verifier.

### 11. What information do I submit to document my work experience?

Work experience documentation may include a resume with recent and relevant experience, including a detailed account of several responsibilities you have completed successfully. For example, you would list the types of verification services or emissions inventory or engineering projects that you have worked on, and what responsibilities you personally had for each project.

**12. I am a CARB-accredited verifier. How do I apply for an additional sector accreditation?**

If you took the accreditation training in November 2020 or February 2024 and passed the sector exam, but lacked sufficient experience to become accredited in that sector, fill out Part I, Part III and Part IV of the [application](#) and email it to [ghgverify@arb.ca.gov](mailto:ghgverify@arb.ca.gov) once you meet the applicable experience requirements. If you have not taken the training and exam for the sector, please see the FAQs in the first section of this document regarding future training opportunities.

**13. Do I need MRR accreditation to provide verification services under LCFS?**

In general, no. The Low Carbon Fuel Standard (LCFS) has a separate verification training and accreditation process: <https://ww2.arb.ca.gov/lcfs-verification>. However, pursuant to section 95502(c)(5) of the LCFS Regulation, one member of the verification team for Quarterly Fuel Transactions Reports submitted by producers and importers of gasoline or diesel, Low-Complexity/Low-Energy-Use Refinery Report, Crude Oil Quarterly and Annual Volume Reports, and Projects must be accredited under MRR as an oil and gas systems specialist. To be accredited as an oil and gas systems specialist, you must be accredited as an MRR general verifier, as well as an MRR oil and gas system specialist.

**14. What are the requirements to become a CARB-accredited verification body?**

A company seeking to provide verification services as a verification body must meet the following requirements for accreditation:

- Must maintain at least five full-time staff members, including two CARB-accredited lead verifiers;
- Retain the specified minimum professional liability insurance of US \$4 million;
- Demonstrate that there are mechanisms in place to prevent conflicts of interest and resolve potential conflict of interest situations if they arise;
- Demonstrate that there are procedures or policies to support technical training related to verification; and
- Disclose any judicial proceedings and enforcement actions filed against the company in the last five years.

**15. Can a verification body subcontract verification services?**

Yes, the regulation allows verification bodies to subcontract verification services that meet the following requirements:

## Guidance for California's Mandatory Greenhouse Gas Emissions Reporting

- All subcontractors must be CARB-accredited verifiers to perform verification services for reporters subject to mandatory reporting;
- The verification body assumes full responsibility for the verification services performed by subcontracted verifiers or verification bodies;
- Subcontracting may not be used to meet the minimum staff total for verification body accreditation;
- A subcontractor may not further subcontract or outsource verification services for an operator; and
- A verification body is responsible for demonstrating an acceptable level of conflict of interest for all subcontractors that it uses.

### **16. Can air districts be accredited to provide verification services for reporters subject to mandatory reporting?**

Yes, air pollution control districts and air quality management districts may also apply and be qualified to provide verification services and must meet the following requirements for accreditation:

- Districts must maintain two CARB-accredited lead verifiers on staff;
- Demonstrate that the District has policies and mechanisms in place to prevent conflicts of interest and resolve potential conflict of interest situations if they arise; and
- Demonstrate that they have procedures or policies to support technical training related to verification.

Please email CARB staff with questions at [ghgverify@arb.ca.gov](mailto:ghgverify@arb.ca.gov).