

IOGP Europe feedback to the Implementing Act on Certification schemes, certification bodies, and audits

IOGP Europe welcomes the opportunity to provide feedback on the draft Commission Implementing Regulation laying down rules on certification schemes, certification bodies, and audits. We support the EU's efforts to create a credible and harmonized certification system for permanent carbon removals, carbon farming, and carbon storage in products.

To ensure the Regulation remains proportionate and operationally feasible, we recommend that it does not represent an extra administrative burden for operators, but rather promote proportionality, flexibility, and coherence with existing international models. Without these, the system may create unnecessary barriers for operators, especially those using emerging technologies or operating at a small scale.

This concern is especially relevant in Article 17, which sets the criteria for recognizing certification schemes. As drafted, the Regulation limits recognition only to those schemes explicitly approved by the European Commission. While oversight is essential, this provision risks excluding operators who rely on well-established international certification schemes that already apply rigorous methodologies and are widely used across borders and sectors. This includes schemes such as Puro.earth or Verra, which many operators have integrated into their reporting, or carbon crediting frameworks. Forcing operators to recertify under a separate EU-recognised scheme would lead to administrative duplication and create barriers to participation, without delivering additional environmental benefit.

To address this, **IOGP Europe proposes the following modification to Article 17:**

~~Only~~ *Certification schemes that comply with the rules laid down in Regulation (EU) 2024/3012, the relevant certification methodologies and the requirements set out in this Regulation, **as well as international certification schemes with equivalent requirements to this Regulation**, shall be eligible for recognition by the Commission.*

IOGP Europe urges the Commission to ensure that the system is designed for practical implementation at scale, avoiding avoidable complexity and fostering efficient participation across a diverse range of actors and methodologies.