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Description of the revision	First Issue

	Department	Date	Name	Signature
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1. Purpose

The purpose of this document is to define the rules for the Verification and Validation of the Carbon Footprint of a product (CFP) carried out by TÜV Italia Srl (hereinafter referred to as TÜV Italia).

2. Field of application

These rules apply both to the verification and validation of the carbon footprint of a product carried out under ACCREDIA accreditation, and without ACCREDIA accreditation.
The main normative references (for areas of responsibility) for activities covered by the regulation are:

- UNI EN ISO 14065 "General principles and requirements for bodies validating and verifying environmental information" latest revision;
- UNI EN ISO 14067 "Greenhouse gases - Carbon footprint of products - Requirements and guidelines for quantification", latest revision;
- UNI EN ISO 14064-3 "Greenhouse gases - Part 3: Specification with guidance for the verification and validation of greenhouse gas statements", latest revision;
- UNI ISO 14066:2016 "Greenhouse gases - Competence requirements for greenhouse gas validation teams and verification teams"
- IAF MD 6:2014 "Application of ISO 14065:2013"
- ACCREDIA Circular No. 19/2018 "Provisions on accreditation for the CFP scheme (Verification and Validation of the Carbon Footprint of a product);

TÜV Italia applies these rules impartially and in exactly the same way, for all organisations utilising its services; in particular, no financial conditions or other undue conditions are ever imposed; access to the certification is not conditional on the size of the organisation or its membership of a particular associational group, nor on the number of previously certified organisations.
It does not prejudice the application of any other regulations on additional certification schemes for which the organisation may be certified by TÜV Italia and/or by other Certification Bodies.

3. Terms and definitions

The terminology used in this Regulation primarily refers to UNI EN ISO 14065 (latest revision) - "General principles and requirements for bodies validating and verifying environmental information".
Attention is drawn to the following definitions in particular:

Organisation
Group, company, business, enterprise, entity or institution, or their parts or combinations, whether or not associated, public or private, which have their own functional and administrative structure.
In these Rules, the term "organisation" will be used to indicate the company requesting TÜV Italia to verify and validate its CFP.

Intended user:
Individual or organisation identified by this GHG-related report generation information as someone who relies on this information to make decisions.

GHG:
A gaseous constituent of the atmosphere, both natural and anthropogenic, which absorbs and emits radiation at specific wavelengths within a spectrum of infrared radiation emitted from the earth's surface, atmosphere and clouds.

Note: GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF_6).

Greenhouse gas statement:
Factual and objective declaration made by the responsible party.

Verification:
Systematic, independent and documented process for assessing the GHG statement against agreed verification criteria.

Verification body:
Body verifying GHG statements in accordance with UNI EN ISO 14065 and UNI EN ISO 14064-3

Verification Statement:
A formal written declaration for the intended user ensuring that the greenhouse gas statement of the responsible party is specified within the level of assurance and relevance established in accordance with the applicable verification criteria.

Guarantee level:
Level of assurance that the intended user requires in a validation or verification.

Note: The level of assurance is used to determine the depth of detail that a validator or verifier plans within their validation or verification plan and sampling plan in order to determine whether there are any material errors, omissions or misrepresentations.

Note: ISO 14064-3 recognises two levels of assurance, reasonable or limited, involving validation and verification assessments written in different terms.

Relevance:
the concept that a single error, omission, misinterpretation or a combination of these could affect the GHG statement and could influence the decisions of intended users.

Note: The concept of materiality is used during the design of validation or verification and sampling plans to determine the type of substantive processes used to minimise the risk of non-detection by the validator or verifier of a material discrepancy (risk of detection).

Note: the concept of materiality is used to identify information that, if omitted or incorrectly specified, would significantly misrepresent the GHG statement to end-users, thereby influencing their conclusions. The acceptable substance is determined by the validator, verifier or GHG programme according to the agreed assurance level.

Material discrepancy:
Single error, omission and misinterpretation or combination thereof on the GHG statement that could influence the decisions of intended users.

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The following is indicated for the definition of **Findings**:
Findings (or Nonconformities) represent situations of non-compliance/misalignment with regulatory requirements, which may emerge as a result of both documentary analysis and on-site verification and are formalised in verification documentation.
These findings are classified as: Major (MaNC) or minor (MiNC) or as Comments (Com):

Major nonconformity (MaNC):
failure to meet a requirement of ISO 14067 or possible errors/discrepancies in the CFP study that affect the final result; this finding, which may also be made in the case of a large number of "minor" nonconformities, is an obstacle to the issue of the verification certificate;

Minor nonconformity (MiNC):
partial non-fulfilment of a requirement of ISO 14067 or if there are inaccuracies in the CFP study that do not affect the final result (applicable only in the case of the CFP Systematic Approach).

Comments (Com):
findings that highlight aspects that do not represent a failure to meet normative requirements, but can be seen as opportunities for improvement.

4. Responsibilities

These rules set out in detail the responsibilities of the organisation and TÜV Italia during the contract pertaining to CFP verification activities.

The client organisations of TÜV Italia may create a link to the homepage of the TÜV Italia website www.tuvsud.com/it-it http://www.tuv.it/ .

5. Control of the rules

These rules shall enter into force on the date indicated in the heading and shall be valid for an unlimited period. These rules are available at www.tuvsud.com/it-it http://www.tuv.it/.
Organisations may request a copy in printed format.

These rules may be revised in the event of:

- Amendments to the documents listed under "Scope" that may have an impact on this document;
- Amendments to the rules and internal procedures of TÜV Italia that may have an impact on this document;
- Other reasons, that will be indicated in the "Revisions" box.

In the event of a revision of the rules, TÜV Italia will duly inform all organisations that have a certification contract in place. Any changes will be highlighted as follows:

- revised and/or additional text is indicated by a right-hand sidebar;
- any cancelled text that has not been substituted will be indicated with {text cancelled}

In the case of a complete revision of the document, the reference to it is given in the table describing the revisions and, since the changes are significant, the individual change is not highlighted, but the entire content of the document is taken into account.

6. Process for the Verification of the Carbon Footprint of a product (CFP)

6.1 General information

The purpose of the verification is to ensure, with an adequate level of assurance, the conformity of the quantification study and the Carbon Footprint of a Product (CFP) report prepared by an Organisation to the requirements of ISO 14067.

If the Organisation, in addition to quantifying and communicating one or more CFPs, decides to develop a set of procedures to facilitate the development of CFPs for several products within the Organisation, it may apply for CFP Systematic Approach Certification specifying the intended scope.

The verification process adopted by TÜV Italia comprises the following fundamental stages:

a. Starting the verification process;
b. Preliminary document verification (Stage 1);
c. Risk analysis (Stage 2);
d. Site verification activities and document verification (Stage 3);
e. Approval or Decision Committee);
f. Issue of the verification certificate;
g. Periodic audits to maintain the certificate (surveillance and renewal audits, which may also include any follow-up audits or post-audits to verify corrective actions required at surveillance or renewal respectively) - only for the CFP Systematic Approach;
h. Possible annual audits for CFP verification in case of a reporting update.

During all verification activities indicated in the previous list and in the period when the contract is valid, the Organisation shall:

- provide all the information (documented and otherwise) needed to conduct the assessment. In particular, access to the project developed within any (e.g. Simapro or Gabi) used for the calculation of the CFP shall be guaranteed, in order to assess the correctness of choices made for the calculation of the CFP. If the information is not accessed, it will not be possible to successfully complete CFP verification;
- give the TÜV Italia audit team access, possibly accompanied (*subject to adequate communication by TÜV Italia*) by personnel from the accreditation bodies, or by *observers, auditors in training or personnel appointed by TÜV Italia to monitor the auditors on-site*, to all areas in which the activities and processes included in the scope are carried out. If

access is not granted, the certificate cannot be issued in case of an initial CFP verification / CFP Systematic Approach renewal audit, or the CFP Systematic Approach certification already issued in case of a periodic surveillance audit must be suspended/withdrawn.

Furthermore, TÜV Italia's client organisation shall promptly send the same a written report in the event of changes to the organisation's consistency and context with respect to previous information provided at the time the certification contract was stipulated, in terms of changes to:

- scope,
- production sites/plants,
- product(s),
- production stages/processes,
- sale to third parties of production stages which come under core processes.

In particular, the organisation that has obtained a CFP Systematic Approach Certificate shall promptly inform TÜV Italia of:

- changes in the scope of the certified CFP Systematic Approach (product/service types, production units, reference CFP-PCR);
- substantial changes to the certified CFP Systematic Approach, e.g. database or allocation procedures for the development of CFP Communications.

The client shall therefore accept TÜV Italia's decision to carry out a new verification process (documentary and/or on-site) or to start a new verification procedure.
in particular:

- in the case of single product CFPs, if there is a change in the above conditions after the contract has been finalised, but before audits are conducted, the offer will be updated and the audit timetable will be modified;
- in the case of a CFP systematic approach, the offer and audit timetable will be updated and will be applied from the first scheduled audit after the notification of changes made by the Organisation.

6.2 Methods for carrying out audits

All types of CFP verification audits are carried out in accordance with the requirements of ISO 14065:2020 and with reference to the UNI EN ISO 19011:2018 guideline, within the framework of an established plan.
Each audit is planned, the dates of the audit and the audit team are communicated in advance to the organisation in writing. The audit team leader prepares an audit plan for site verification audits (Stage 3), which is sent by the audit team leader to the organisation well in advance.
Each audit begins with an introductory meeting between the organisation's management (or designated representative) and the audit team.
During the audit, the audit team collects objective evidence by examining documents and records, accessing calculation software, directly observing activities, etc.; to this end, the audit team uses specific documentation already prepared (checklists or guidelines), which should be considered as guidance and not binding (therefore team may also carry out controls not expressly provided for in the above-mentioned documentation).
The audit ends with a final meeting where the audit team reports to the organisation’s management (or designated representative), on the audit results, indicating both the positive aspects and any deficiencies regarding relevant requirements. The audit results are recorded in a report.

For its part, the organisation is committed to cooperating to the utmost with the audit team during all the stages described; in particular:

- the organisation shall give the audit team access to areas of interest for the audit and shall interview the persons involved in these activities; In particular, it must be possible to see all the stages of the production cycle performed by the company and coming under the core process, the raw materials supplied, the finished products, the systems for recording consumption and production processes, the thermal generation and flue treatment plants.

- The organisation shall provide the audit team with detailed information on the specific risks existing in the environment in which they will work and on the prevention and emergency measures adopted, based on occupational health and safety requirements in force; it also undertakes either to provide any personal protective equipment to the audit team members, or to give advance notice to TÜV Italia of the type of personal protective equipment the audit team must have;
- the organisation shall give the audit team the documents necessary to carry out the audit; these are both planning documents and records required by the standard for which the organisation intends carrying out verification activities;
- the organisation shall identify a person to act as an interface with TÜV Italia during the operational stages of the audit process.

The organisation retains the right to request and receive information on the audit team appointed by TÜV Italia and, where applicable, in the event of a conflict of interest, to object to the appointment of team members, giving adequate reasons for its request. In the case of audits at short notice (or without notice), TÜV Italia shall take particular care in appointing the audit team due to the client's lack of possibility to not accept the members of the audit team.
Lastly, in accordance with the rules governing the activities of certification bodies, the organisation is bound to accept the possible presence of observers from TÜV Italia and the ACCREDIA accreditation body in charge of monitoring the audit; however, the afore-mentioned right still applies, but non-acceptance of the performance of audit monitoring activities will result in the audit certificate not being issued or being withdrawn.

6.3 Starting the verification process

The Organisation intending to request TÜV Italia services shall provide the data required by the information questionnaire in writing.
Once these data have been obtained, the offer is prepared with the description of the service offered, complete with all the information relating to the activities (including the duration in terms of man-days of the members of the audit team) and the prices determined on the basis of applicable rates.
The offer is sent together with the "Order Form", which certifies the acceptance of the contractual conditions, that also include these rules.
The verification process is started by TÜV Italia reviewing the client's acceptance of the offer, which subsequently leads to the assignment of a file (or order) number.

6.4 Verification of the individual product CFP

Verification is a one-off activity aimed at assessing the reliability of data relating to the quantification of the CFP over a specific period of time. It is therefore not meant to be certification covering several years. For this reason, the verification of CFPs does not include any surveillance cycle covering several years.
Any long-term contract that may be stipulated between the parties regarding the CFP of the same product shall therefore be understood as a contract of multiple independent verification activities.

Verification activities are carried out on the basis of the CFP Study Report, prepared by the Organisation and the objective evidence it makes available to confirm the quantification carried out.
CFP verification activities carried out by TÜV Italia comprise the following stages:

1. preliminary document verification (Stage 1);
2. risk analysis (Stage 2);
3. carrying out the verification (stage 3).

6.4.1 Preliminary document verification (Stage 1)

Document verification is carried out off-site by the appointed Lead Auditor.
The lead auditor shall assess the Carbon Footprint Study Report provided by the Organisation in terms of completeness and correctness, in accordance with the requirements of ISO 14067 and ISO 14064-3 and any applicable PCR (Product Category Rules).

This review shall consider at least the following aspects of the CFP study:

- product identification
- general product characteristics
- identification of the production site(s)
- description of the production process
- indication of life cycle stages
- the adequacy of the FU (and/or DU) considered and the related reference flows;
- GHG emissions related to the main stages of the product life cycle and their actual breakdown (e.g. fossil, biogenic, etc.);
- physical, temporal and geographical system boundaries;
- the cut-off criteria and their correct application;
- approach and allocated procedures;
- the relative weight of the individual life cycle stages and the adequacy of the level of detail of the study adopted for the most relevant stages;
- data quality assessments;
- the results of the sensitivity and uncertainty analyses of the CFP study;
- the assumptions made for the use and end-of-life stages, where applicable.

If, in the Lead Auditor's judgement, the CFP study report does not contain sufficient information to comprehensively complete document verification, the Lead Auditor shall request the necessary additional information from the organisation. Failure to provide the requested additions will prevent the audit from continuing.
The following are considered as conditions preventing the completion of document verification:

- lack of/incorrect identification of the product
- lack of/incorrect identification of the production site
- major methodological errors in the study design
- information gaps that make the study and its results incomprehensible

The Preliminary Documentary Assessment Report must clearly indicate any nonconformities (NC) of the CFP study.
At this stage, all NCs are classified as Major (MaNC).
The Stage 1 Report outlines which deficiencies are to be considered as "obstructing" the verification process continuing, and must therefore be resolved prior to any further verification activities, and which deficiencies instead can be resolved prior to the completion of the verification process.
Failure to fully resolve the obstructive MaNC prevents the continuation of the verification.
The result of Document Verification is used as input for the subsequent risk analysis of the verification (Stage 2) and preparation of the Verification plan (Stage 3).

6.4.2. Risk Analysis (Stage 2)

TÜV Italia shall conduct a risk analysis, taking into account the sources and scale of any errors, omissions or misrepresentations in order to prioritize the areas and extent of verification of CFP data and information and to provide input for the development of the verification and sampling plan.

The risk analysis shall be based on Document Verification and any other information useful to understand the nature and complexity of the life cycle and characteristics of the main processes under review.

In developing the risk analysis, at least the following is considered:

- the level of detail of available documentation;
- the nature of the allocation methods;
- the degree of complexity and extent of system boundaries;
- the representativeness of use and end-of-life scenarios, where applicable;

On the basis of the results of Document Verification and Risk Analysis, taking into particular consideration the sources and scale of any errors, omissions or misrepresentations, TÜV Italia defines a verification plan and a sampling plan, which are prepared or approved by the Lead Auditor.
The Verification Plan is sent to the organisation well in advance of the start date of stage 3 activities (usually at least 7 days beforehand).

6.4.3 Carrying out the Verification (Stage 3)

TÜV Italia's decision to carry out the on-site audit will be made on the basis of the outcome of the document verification and subsequent risk analysis (see sections 6.4.1 and 6.4.2).
In particular, on-site verification will not be possible if at least one of the following conditions occurs:

- obstructive MaNCs were identified during the initial document verification, that have not been resolved;
- there are gaps or inconsistencies regarding the physical consistency between the production site and description given in the CFP study;
- there are gaps or inconsistencies regarding the proper collection, tracking and possible processing of primary data;
- there are gaps or inconsistencies in the reliability of the model developed in the CFP study;
- the risk analysis identified a level of risk that might not allow TÜV Italia to guarantee reliability with a "reasonable" level of assurance.

The on-site audit may be conducted both at the location of the production process (preferential choice) and where the data and information useful for the CFP is collected and managed.

During Verification activities, the Audit Team shall ensure, based on a meaningful sampling and within the timeframe stipulated in the contract, that:

- The organisation is familiar with and able to manage all aspects of the CFP quantification being validated,
- The data contained in the CFP report is supported by objective evidence to ensure its reliability with a "reasonable" level of assurance.

At the end of the audit, the Audit Team analyses all the information and evidence gathered, in order to review the findings of the activities and define conclusions.
The Lead Auditor then completes a Verification Report which also indicates any Nonconformities and Comments.

The issue and maintenance of the Verification Certificate does not constitute a guarantee on the part of TÜV Italia that the organisation complies with its legal obligations.
The organisation is solely responsible for the correct performance of its activities and the conformity of the same and of its products/services to applicable regulations and to expectations of clients and stakeholders, with the exclusion of any responsibility or obligation of a guarantee on the part of TÜV Italia.

6.5 Verification of the CFP Systematic Approach

The verification of the conformity of the CFP Systematic Approach of the Organisation is carried out by TÜV Italia with reference to the requirements in Annex C to ISO 14067.
For this verification, the same steps as those indicated in sections 6.4.1. to 6.4.3. are carried out, with specific adaptations if necessary.

The verification of conformity also includes the verification of a sample of a single product CFP generated by the Organisation's Systematic Approach.
In order to verify the CFP Systematic Approach, the Organisation shall have developed at least 1 CFP report using the Systematic Approach.

The verification is aimed at certifying the CFP Systematic Approach of an Organisation.
CFP Systematic Approach certification is valid for three years and includes periodic (annual) surveillance.

CFP Systematic Approach verification is conducted on the basis of:

- documentation on the CFP Systematic Approach made available by the Organisation;
- the sample of the CFP Study Report for a single product generated by the Organisation's CFP Systematic Approach;
- objective evidence made available by the Organisation to confirm CFP values.

The CFP Systematic Approach verification process includes both a document review and on-site verification.

The on-site audit may be conducted both at the location of the production process (preferential choice) and where the data and information useful for the CFP is collected and managed.

During Verification activities, the Audit Team shall ensure, based on a meaningful sampling and within the timeframe stipulated in the contract, that:

- The Organisation has correctly implemented procedures to support the CFP Systematic Approach;
- The Organisation is familiar with and able to manage all aspects of the quantification of CFPs generated by the Systematic Approach,
- The data contained in the CFP report is supported by objective evidence to ensure its reliability with a "reasonable" level of assurance.

At the end of the audit, the Audit Team analyses all the information and evidence gathered, in order to review the findings of the activities and define conclusions.
The Lead Auditor then completes a Verification Report which also indicates any Nonconformities and Comments.

The issue and maintenance of the CFP Systematic Approach Certificate does not constitute a guarantee on the part of TÜV Italia that the organisation complies with its legal obligations.
The organisation is solely responsible for the correct performance of its activities and the conformity of the same and of its products/services to applicable regulations and to expectations of clients and stakeholders, with the exclusion of any responsibility or obligation of a guarantee on the part of TÜV Italia.

6.6 First issue of certification and renewals

The issue of the Verification Certificate is decided by the TÜV Italia approval committee after it has received and approved the audit team's favourable report and other documents and data comprising the audit file (this data may be information in the public domain, the organisation's comments on the audit report).
It is for the approval committee to issue a negative opinion for all or part of the certification file; in this case and depending on the situation, as assessed by the approval committee on a case-by-case basis, the reports may be revised by the committee, with the changes being notified to the organisation in various forms, either by amending the audit reports or by formal communication. The certificate/certification is then issued on the basis of the changes made.
The approval committee may also decide not to issue the certificate. In this case, TÜV Italia will formally inform the organisation of the reasons for this decision.

The documents certifying that the certificate has been obtained comprise:

a. a letter of approval: the positive outcome of the decision, indications on the use of the certification mark and, in the case of a systematic approach, the conditions for maintaining the certification issued, the expiry date of the certification set at 3 years from the date of approval of the certification or for renewal at 3 years from the date of expiry of the previous certificate, the timescale within which the next surveillance audit must be carried out.

b. a certificate containing the following: an identification number with the corresponding revision, the company name of the organisation with its site(s) and address(es), the applicable reference standard, the date of issue which coincides with the date of approval of the certification, the logo of the accreditation body (if applicable), the signature of the authorised TÜV Italia manager.

In addition to the above, in the case of a CFP Verification Certificate, the following information is included:

- reference to ISO 14067;
- the description and unique identification of the product(s) covered by the CFP;
- the CFP-PCR or relevant PCR (hereafter both referred to as 'PCR') used, if any, in accordance with the requirements of ISO 14067;
- the functional unit (FU), or declared unit (DU) if required by the PCR;
- the CFP value expressed in kg (or g) of CO_2 and in the FU or DU;
- the production sites included in the study;
- system boundaries in the case of a partial CFP or confirmation that the CFP includes all stages from the cradle to the grave;
- the breakdown of the CFP value for the main life cycle stages (upstream, core, downstream) and, where present, the reference PCR;
- any stages excluded from the system boundaries, where applicable;
- reference to the CFP study report;
- the time and geographic boundaries of the CFP.

In the case of the CFP Systematic Approach, the certificate issued is valid for three years and the Scope and expiry date of the certificate must be specified.

The issue of the certificate automatically entitles the Organisation to use the certificate issued by TÜV Italia, in accordance with the procedures described in section 8 of these rules.

7. Register of audited organisations

Once CFP certification has been issued, TÜV Italia updates its register of certified organisations, which contains at least the following information:

- identification of each certified organisation;
- the validity status of the certification;
- the reference standard (specifying any exclusions of non-applicable requirements);
- the product(s) covered by the certificate and the production site(s).

This register is available to the public (including on the TÜV Italia website) and is provided free of charge to applicants.

In compliance with legal requirements on the protection of privacy, the signing of the certification contract constitutes authorization for TÜV Italia to publish the organisation's data in the register (unless the organisation specifically prohibits TÜV Italia from doing so in writing).

8. Reference to the use of the Verification Statement and the Mark

The Organisation shall prepare and, after certification, put in place a documented procedure for the management of referencing use of the Verification Statement and Mark; this procedure shall indicate the department(s) of the Organisation that are responsible for this area, in particular, the ways in which the Verification Statement and Mark will be used.
TÜV Italia checks the correct use of the Verification Statement and of the Mark during the audits carried out after the first verification (if applicable).
Detailed indications of how to use the Verification Statement and Mark of TÜV Italia are contained in a specific document (Guide to certification marks – Rules and Referencing of certification – Use of the certificate and mark, which is available at www.tuv.it
In the case of suspension or withdrawal of the certificate (CFP Systematic Approach), the certified Organisation shall stop all use of the certificate and mark of TÜV Italia and of any other reference to the certification; If this does not happen, TÜV Italia may take legal action.

9. Suspension of certification

In the case of a CFP Systematic Approach, TÜV Italia, for reasons it considers serious and explained in writing to the organisation, may suspend the validity of certification already granted for a defined period of time and in any case for no more than 6 months.
In such cases, the Organisation will lose, for the period of time considered and defined by TÜV Italia, the right to refer to said certification and therefore, in particular, also the license to use the TÜV Italia trademark.
In particular, certification may be suspended in any of the following cases:

- the Organisation does not perform the post-audit necessary to verify the correct and effective closure of the nonconformities identified during the surveillance or renewal audit.
- the post-audit related to surveillance has a negative outcome following a failure to close the corrective actions defined for the Nonconformities. In this case, the maximum period of the suspension is identified by taking as the reference the surveillance key date (the month and day of the end of stage 2 activities including any post-audit) plus six months.
- the Organisation does not carry out the surveillance audit within the specified time.
- the Organisation does not accept the performance of special or unscheduled audits (ref. section 6.10 of these Rules)
- the Organisation refers to the certification in an incorrect way.
- Complaints are not handled properly.
- the Organisation is more than fifteen days late in paying amounts due.
- In the event that legal proceedings are underway or the process has been started to notify in advance the start of legal proceedings against the Organisation, TÜV Italia may proceed with the precautionary suspension of the certificate until such time as when elements underlying the proceedings taken have been clarified, and objective evidence of the non-involvement of the CFP Systematic Approach certified or of its elements or responsibilities in the aforementioned legal proceedings has been obtained.
- the Organisation modifies its management system in such a way as to affect the certification issued without informing TÜV Italia.
- the Organisation does not notify corporate changes that might affect the certification issued.
- The Organisation is put into liquidation or transferred/sold to third parties and/or is acquired by third parties or ceases its activities or is involved in judicial and extrajudicial creditor arrangements, or is declared bankrupt.
- At the direct request of the Organisation, justifying the reasons, for a period not exceeding 6 months and in any case not beyond the expiry date of the certificate.

If certification is suspended, TÜV Italia will officially notify the organisation in the manner provided for by law, also communicating the conditions that the organisation must meet, within a specified period of time, in order for certification to reacquire full validity and not be permanently cancelled.
TÜV Italia may make such notification public.
Should the organisation, after the suspension of the certification, continue to refer to it in any way, TÜV Italia may take legal action.
If the Organisation meets the conditions established by TÜV Italia by the end of the suspension period, TÜV Italia will lift the suspension of the certification, giving official notice to the organisation. If, instead, at the end of the suspension period the organisation still fails to meet the established conditions, TÜV Italia will withdraw the certification (see section 10).
If notification of the suspension of certification has been made public, any subsequent lifting of the suspension shall also be made public.
All decisions related to the suspension of certification (and lifting of the suspension) at TÜV Italia are properly documented.

10. Withdrawal/cancellation of the certification

Only in the case of the CFP Systematic Approach, TÜV Italia, for reasons deemed to be of considerable gravity and duly justified in writing to the organisation, may cancel the validity of the certification already granted, which automatically entails the withdrawal of the authorization issued to the organisation to refer to the certification in the manner described (see section 8).
In particular, the withdrawal/cancellation of certification may occur in any of the following cases:

- the organisation does not comply with the conditions set by TÜV Italia to lift the suspension of the certification;
- the organisation stops manufacturing the products/providing the services, processes, services mentioned in the certificate for a period of time exceeding 1 year;

- the organisation terminates the certification contract;
- TÜV Italia changes the rules of the certification system and the organisation cannot or does not want to comply with the new requirements;
- when circumstances occur, such as those referred to for suspension, which are judged by TÜV Italia to be particularly serious;
- if the Organisation does not accept the new economic conditions established by TÜV Italia for the possible amendment to the contract.

Withdrawal/cancellation of certification shall, in all cases, be notified to the organisation in the forms required by law, and TÜV Italia may make such notification public; in particular, it notifies ACCREDIA in the case of certificates issued within ACCREDIA-accredited sectors of activity, and if provided for by the rules for the accreditation of specific certification schemes or sectors.
Should the organisation, after the withdrawal/cancellation of the certification, continue to refer to it in any way, TÜV Italia may take legal action.
All decisions related to the withdrawal/cancellation of certification at TÜV Italia are properly documented.

11. Management of claims and reports by client organisations and by interested parties

The organisation (already certified by TÜV Italia or not yet certified, but which nevertheless uses TÜV Italia's certification services) shall have prepared and implemented a documented procedure for the management of complaints and reports that ensures:

- the registration of complaints and reports received from its clients and interested parties related to products, processes, services to which the CFP/CFP Systematic Approach applies;
- appropriate investigations of these reports, and their registration;
- the adoption, where necessary, of corrective actions and their registration;
- a reply in writing to the complainant within a specified timeframe.

The organisation shall keep these records at the disposal of TÜV Italia, which may examine them during audits.

12. Amendments to the rules of verification activities

TÜV Italia may modify its verification system as described in these rules.
If it does, TÜV Italia will allow the already-certified organisations to make observations on the proposed changes.
Once the changes have been decided, TÜV Italia will specify the date on which they will come into force, and will give details of the changes and any corrective actions required from the organisations, allowing them a reasonable period of time to align.
If an organisation cannot or does not want to adapt to the new rules, TÜV Italia will withdraw or cancel the certification (see section 10).

15. Special requirements for organisations already holding a CFP Systematic Approach certificate issued by another body (transfer of certification)

TÜV Italia will transfer CFP Systematic Approach certificates applying the requirements of the international document IAF MD 2:2017.
Only an accredited, valid certificate may be transferred. A suspended certificate (of which the suspension status is known), cannot be transferred.

Only certificates issued by an IAF-accredited or MLA regional body at level 3, and, where applicable, at levels 4 and 5, are acceptable for transfer. Organisations with certification that are not covered by these accreditations must be treated as new clients.

The information needed for the transfer can be collected through the client and reviewed 'on-site' or 'off site'. This information may alternatively be requested from the outgoing CB, who shall provide it.
The outcome of the review shall be documented and appropriately recorded.

Based on the outcome of the documentation review and if necessary, for example in the case of major nonconformities that have been suspended or not yet closed, TÜV Italia may conduct "pre-transfer visit" at the client's site, to confirm certification validity, before proceeding with the transfer.
The decision about the transfer of certification shall be taken before starting any surveillance audit or re-certification activities on-site.
If the pre-transfer review process does not identify any problem, the certification cycle shall be based on the previous certification cycle defined by the previous Certification Body and TÜV Italia shall establish the audit programme for the remainder of the certification cycle.
The new certificate may indicate, as the "FIRST CERTIFICATION" date, the initial certification date indicated by the previous Certification Body on its own certificate, with the phrase "Issued by another Certification Body".

In compliance with point 9.5.2 of ISO / IEC 17021-1, it is not possible to issue a certificate until:

a) the adoption of corrections and corrective actions for all Major Nonconformities issued by the previous CB has been checked;
b) the client's action plans for corrections and corrective actions adopted for all minor nonconformities issued by the previous CB have been accepted.

If the pre-transfer review (document review and/or pre-transfer visit), identify problems that prevent the transfer of the certificate, TÜV Italia shall consider the client as a new client.

If a request is received from another CB to transfer a certificate, TÜV Italia shall inform the incoming CB of any withdrawal or suspension of the certificate.
If the certificate is valid, TÜV Italia shall request authorisation from the client to provide the information requested by the incoming CB, and shall request the client to confirm its intention to terminate the contract.
The client certificate will not be suspended or withdrawn after notification of the transfer received by the other CB, if the client continues to meet the certification requirements.

16. Confidentiality

TÜV Italia assures that all information obtained in the course of certification activities shall be considered confidential, in compliance with applicable mandatory legislation and technical standards, and shall be treated confidentially at all levels of its organisation, except as provided for by law or by the accreditation bodies or if authorized in writing by the Organisation concerned.
TÜV Italia shall also be aware of its duty to guarantee the protection of the Organisation's proprietary information and any other material and document of intellectual property, whereby proprietary information shall mean, by way of example but not limited to, any idea, concept, know how, patents, projects, prototypes, industrial secrets and financial information.
This principle of protection will not include information that has entered the public domain.

17. Complaints (or Appeals)

The Organisation using TÜV Italia's certification services shall have the right to submit written appeals or appeals against the decision taken by TÜV Italia regarding the granting, suspension or withdrawal of certification.
The Organisation that decides to appeal shall send a letter by registered mail with return receipt to TÜV Italia S.r.l. for the attention of the Director of the BA Division - Via G. Carducci 125 ed. 23 - 20099 - Sesto San Giovanni (MI).
This letter shall include the Organisation's details, the subject matter of the appeal, the reasons for the appeal, any attachments in support of the reasons previously referred to, and the signature of the Organisation's legal representative.
It should be noted that the absence of one or more of the above elements constitutes grounds for dismissing the appeal; in such cases, TÜV Italia shall send the sender a communication stating the reasons.
The Division Director, with the support of the Head of Legal Affairs, will initiate the review of the appeal involving the parties concerned and at the end of this review, the claimant will be informed of the outcome of the action within two months from the date when the appeal was received

18. Complaints against TÜV Italia

TÜV Italia shall take into consideration complaints and reports from the market concerning client Organisations under the following conditions:

- the complaint shall be formalised in writing (any medium such as letter, fax, e-mail is acceptable) and shall describe in detail the situation that is the subject of the complaint/report;
- the complaint shall indicate the name and address of the complainant/reporting party;
- the reasons for the complaint/report shall be formalised.

If such information is not available in the complaint or report submitted by the Organisation or from another source, the Organisation shall be contacted for clarification.
Complaints and reports are managed through a special complaints register and an initial response will be sent for each complaint/report within 10 working days of receipt.
Complaints are examined by the Division Director, or a person delegated by him/her, who carries out appropriate investigations and enquiries with the help of departments concerned, analyses documentation received and carries out necessary investigations.
If necessary, TÜV Italia reserves the right to conduct an additional audit to verify the status of the management system of the Organisation that is the subject of the complaint/report. These unscheduled audits will be conducted in accordance with indications in section 6.10 above.
At the end of the complaint/report management process, TÜV Italia shall send a written notification to the complainant/reporting party regarding the outcome of the investigation and any measures adopted.
Information about the content of the complaint/report and its resolution cannot be made public without the consent of the parties involved.

19. Disputes

In the event of any dispute with TÜV Italia srl, the Court of Milan has jurisdiction.

20. Financial conditions

TÜV Italia defines the economic conditions applicable to its certification activities so as to obtain a sufficient profit to guarantee independence in the performance of its activities and allow for the continual improvement of services offered, both traditional and innovative.
TÜV Italia prepares offers for each certification request received and sends it to the applicant Organisation. This document contains all the technical and economic information related to the requested activities.
The quotation is prepared based on the information received in a questionnaire filled in by the requesting Organisation, also considering the specific criticalities and risks of the processes, the environmental aspects, the specific requirements established by accreditation bodies or by national and international binding documents.

After the contract has been signed, TÜV Italia reserves the right to revise contract documents if, during the certification cycle, it discovers variations with respect to the conditions declared by the Organisation and on the basis of which the offer was issued, subject to notification to and acceptance in writing by the Organisation. If the Organisation does not accept the offer, the contract will be terminated and the certificate, if already issued, will be immediately withdrawn.

If, for any reason, the Organisation breaches the Contract after its confirmation or withdraws in advance, TÜV Italia reserves the right to charge a penalty. This will be an amount equal to the residual value of the Contract discounted at the withdrawal time based on the increase in the cost of living (ISTAT index) of consumer prices increased by 3 points plus the cost of the services already offered. This is without prejudice to compensation for further damages.
If - without withdrawing from the Contract - the Organisation cancels a single scheduled audit activity within the 20 working days preceding the agreed date, TÜV Italia reserves the right to charge the full amount of the scheduled activity.