



REQUIREMENTS FOR CERTIFICATION BODIES & AUDITORS

CERTIFHY EU RFNBO VOLUNTARY SCHEME

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1. Status of this document

This document, 'Requirements for Certification Bodies and Auditors', is part of the CertifHy EU RFNBO Voluntary Scheme.

All CertifHy EU RFNBO Voluntary Scheme documents in their latest applicable version are valid and must be considered for the scope of application.

In the event of conflict between the text of this document and the CertifHy EU RFNBO Voluntary Scheme Document, the CertifHy EU RFNBO Voluntary Scheme "Scheme Document" shall always take precedence.

1.1 Change History

Version	Date	Description
1.0	28.02.2023	Version 1.0
1.1	10.07.2023	Version 1.1: Adjustments following the publication of an updated version of the Assessment Protocol for Voluntary Schemes for RFNBOs)
1.2	15.01.2024	Version 1.2: Adjustments taking up the Q&A Document of the European Commission of 26.07.2023)
1.3	02.05.2024	Version 1.3: Adjustments taking up the Q&A Document of the European Commission of 14.03.2024 and feedback from DG ENER
1.4	15.07.2024	Version 1.4: - Additional requirements on integrity rules and processes - Clarity on avoiding conflicts of interest - Adjustments to requirements for Auditors - Clarifications on training requirements
1.5	25.07.2024	Version 1.5: - Minor amendment on the competence management of Certification Bodies
1.6	31.10.2024	Version 1.6: - Update to RED reference and editorial adjustments
1.7	22.10.2025	Version 1.7: - Editorial adjustments



2. Purpose of this document

The purpose of this document is to make sure that Certification Bodies recognised by the CertifHy EU RFNBO Voluntary Scheme carry out evaluations and certification of Economic Operators according to CertifHy EU RFNBO Voluntary Scheme requirements in a stringent, efficient, impartial, consistent, comprehensive and transparent way.

This document lays down the requirements for Certification Bodies to become recognised by CertifHy Scheme Operator, and the duties of Certification Bodies recognised by CertifHy, performing certification services for CertifHy. Furthermore, this document lays down the requirements for and necessary qualifications of Auditors conducting Audits according to the CertifHy EU RFNBO Voluntary Scheme.



3. Scope and Normative References

The requirements specified in this document apply to all Certification Bodies and Auditors conducting Audits or performing certification services under the CertifHy EU RFNBO Voluntary Scheme.

The Certification Body shall follow all requirements of the international standards ISO 17065¹ and ISO 14065².

The Certification Body shall conduct Audits in line with the international standards ISO 19011³ and ISO 14064-3⁴.

The Certification Body shall conduct the assessment of greenhouse gas calculations in line with the requirements defined in the Revised Directive EU/2018/2001⁵ together with the Commission Delegated Regulation 2023/1184 supplementing Revised Directive EU/2018/2001 of the European Parliament and of the Council.

¹ Conformity assessment — Requirements for bodies certifying products, processes, and services

² General principles and requirements for bodies validating and verifying environmental information

³ Guidelines for auditing management systems

⁴ Greenhouse gases - Part 3: Specification with guidance for the verification and validation of greenhouse gas statements

⁵ Revised Directive EU/2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast); OJ L 328, 21.12.2018, p. 82



4. Requirements for Certification Bodies

4.1 General Requirements

The Certification Body must ensure appropriate expertise and experience, both in the relevant fields of activity and for the types of auditing tasks it will undertake.

The Certification Body must have implemented a competence management system for personnel involved in the certification process according to ISO 17065. This involves systematically ensuring that personnel involved in the certification process have the necessary skills, knowledge, and abilities to perform their tasks effectively and to the required standard. This is crucial for maintaining the credibility, reliability, and quality of the certification services provided.

The Certification Body must have established a dedicated scope for hydrogen certification, which requires the following:

- Specific Auditor competences defined in this document (see Chapter 6).
- A certification process that includes all CertifHy EU RFNBO Voluntary Scheme requirements explicitly.
- Specific training of Auditors on CertifHy EU RFNBO Voluntary Scheme.
- An internal Audit (and accompanying specific report) that demonstrates compliance of the Certification Body with CertifHy EU RFNBO Voluntary Scheme requirements.

4.2 Independence and Impartiality

Certification Bodies shall establish integrity rules and procedures to ensure their full independence from the Economic Operators participating in the Scheme. Those rules and procedures shall be regularly reviewed and tailored to the size and scope of the Certification Body's activities. The CertifHy Scheme Operator may request Certification Bodies to provide reports on the enforcement and monitoring of these integrity measures.

The Certification Body, its Auditors and employees must remain impartial and free of conflicts of interest according to ISO 17065. Any person having a potential conflict of interest shall be excluded from decision-making. Audits and certification decisions must be conducted independently of any personal relationships, commercial or financial incentives or other influences. The Certification Bodies and the Auditors are independent of the entities audited.

The Certification Body must have a conflict of interest policy and supporting procedures in place, requiring Auditors and technical experts to declare any potential conflicts of interest prior to any engagement. Accordingly, the Certification Body must establish and document procedures to identify and manage any conflicts of interest that may arise during CertifHy certification activities.

A conflict of interest may arise when an Auditor or Certification Body has a personal or financial connection to the Economic Operator being audited. This includes, but is not limited to, situations where the Certification Body or Auditor has previously served as a consultant or advisor for the same scope or activity under Audit or has held a position that could compromise



their impartiality or influence the audit outcome. A conflict of interest may also exist if a family member or close associate of the Auditor is involved in the company's activities, or if the Auditor holds financial interests related to the Economic Operator's activities. The requirements above shall be applied to all auditors and organs of Certification Bodies involved in the decision-making process during certification, including those responsible for final approval of the certificate issuance.

In all cases, the potential impact of any previous relationship with the company must be evaluated on a case-by-case basis. If a potential conflict of interest exists, the individual should not be assigned to the auditing or decision-making process.

In situations of uncertainty, the Certification Body shall provide an alternative solution which is free of conflict of interest as the default option. The Certification Body may consult with the CertifHy Scheme Operator to facilitate a resolution.

4.3 Recognition or Accreditation

A Certification Body performing Audits according to a Voluntary Scheme shall be accredited to ISO 17065, and to ISO 14065 where it performs audits on actual GHG values.

Certification Bodies shall also be accredited by a national accreditation body and in accordance with Regulation (EC) No 765/2008 or recognised by a competent authority to cover the scope of Revised Directive EU/2018/2001 or the specific scope of the CertifHy EU RFNBO Voluntary Scheme and must provide proof of this accreditation or recognition to the CertifHy Scheme Operator as part of its application for recognition. Competent national authority means the authorities of the EU Member States in line with Regulation (EC) 765/2008.

Recognition of a Certification Body must be performed by competent national public authorities which are officially responsible for the recognition of Certification Bodies in the framework of the Revised Directive EU/2018/2001 and according to the regulatory framework of the national transposition of the EU Directives in a Member State or an EEA country.

Accreditation must be performed by a national Accreditation Body which is a member of the International Accreditation Forum (IAF).

The Certification Body is obliged to inform the CertifHy Scheme Operator immediately if the accreditation or recognition is suspended, withdrawn, or terminated by the Accreditation Body or by the competent national public authority.

4.4 Agreement with CertifHy

The Certification Body shall enter into an agreement with CertifHy before conducting any auditing or certification activity in accordance with the CertifHy EU RFNBO Voluntary Scheme. This requires the submission of a written application to the CertifHy Scheme Operator, which can be done via the CertifHy website. Following the application, the Certification Body will be asked to provide evidence of its recognition or accreditation by the competent national public authority (e.g. by submitting the certificate of accreditation) and of all necessary documentation to evidence that the Certification Body and its Auditors are compliant with all applicable requirements. If the CertifHy Scheme Operator has received sufficient evidence from the applying Certification Body, it will provide a Cooperation Agreement to the Certification Body. The Cooperation Agreement must be



accepted and signed by both the Certification Body and by the CertifHy Scheme Operator. Once both parties have signed the Agreement, the Certification Body is officially recognised by the CertifHy Scheme Operator.

Once recognised, the Certification Body may use the CertifHy logo and other trademarks in accordance with the CertifHy scheme document 'Labels, Logos & Claims'.

The CertifHy Scheme Operator will publish the name, address, and logo of each recognised Certification Body on the CertifHy website. Additionally, the CertifHy Scheme Operator will publish the Accreditation Body or national public authority that has accredited or recognised the Certification Body.

The CertifHy Scheme Operator will also publish the name of the responsible CertifHy Scheme Manager and contact details of the Certification Body.



5. Duties and Responsibilities of Certification Bodies

5.1 CertifHy Scheme Manager

The Certification Body must appoint one CertifHy Scheme Manager to act as main contact person for CertifHy. The CertifHy Scheme Manager must have obtained the following qualifications:

- At least two (2) years higher education diploma or equivalent in a discipline relevant to the scope of certification
- English language skills to read, comprehend, interpret, implement, report-writing, and otherwise handle the original documents published by CertifHy
- Experience in and knowledge of auditing traceability in chain of custodies, such as mass balance systems and data collection and handling

The Certification Body must provide the CertifHy Scheme Operator with the name and contact details of the selected CertifHy Scheme Manager via e-mail. The name of the appointed CertifHy Scheme Manager of the Certification Body will be indicated and published on the CertifHy website together with the information in the CertifHy list of approved Certification Bodies.

The CertifHy Scheme Manager must complete the CertifHy EU RFNBO Training. The CertifHy Scheme Manager shall participate in meetings for approved Certification Bodies organised by the CertifHy Scheme Operator.

The CertifHy Scheme Manager is also responsible for informing all relevant members of staff within the Certification Body about updates and amendments to any aspects relevant to the certification process as indicated by CertifHy (e.g. through CertifHy Scheme Updates, notifications to Certification Bodies, etc.).

5.2 Staffing requirements

The Certification Body must ensure that it has sufficient qualified staff fulfilling the requirements listed in Chapter 6.

The Certification Body is responsible for ensuring all Auditors involved in certification activities successfully complete the required trainings (see Chapter 6).

The Certification Body must maintain and provide comprehensive records of the education, training, skills and experience of each Auditor involved in certification activities as well as other relevant personnel.

As part of the application for recognition by the CertifHy Scheme Operator, the Certification Body must provide evidence (as part of their application for recognition) that its Auditors meet the CertifHy EU RFNBO Voluntary Scheme requirements defined in Chapter 6.

The Certification Body must have a procedure in place to ensure that every Auditor involved in certification activities conducts at least one Audit annually under a CertifHy EU RFNBO Voluntary Scheme standard to maintain scheme knowledge.



5.3 Quality Management

The CertifHy Scheme Operator undertakes several measures to monitor scheme integrity and guarantee the quality of Audits as well as compliance with the Scheme requirements. The quality management of the Certification Body should ensure continuous improvement of its activities related to the CertifHy EU RFNBO Voluntary Scheme. This includes preventative, monitoring and corrective measures to assure a high level of quality. The Certification Bodies must have a documentation system according to ISO 17065, including inter alia the following elements:

- General quality management system regarding the definition of responsibilities
- Documentation management system, including the monitoring of documents, monitoring of records, management review of the management system, internal Audits, as well as procedures for the identification and management of Non-conformities and procedures for taking preventive actions to eliminate the causes of potential Non-conformities
- Internal processes of the Certification Body, which include sufficient process descriptions and clear responsibilities related to activities performed in relation to the CertifHy EU RFNBO Voluntary Scheme
- Services provided to external parties (Economic Operators), including the communication with the CertifHy Scheme Operator and any reporting requirement related to the CertifHy EU RFNBO Voluntary Scheme

Recognised Certification Bodies are obliged to submit an annual report to the CertifHy Scheme Operator by the end of February for the preceding calendar year. This report must have the following structure including the following information:

- Administrative information: name and contact details of the Certification Body
- Audits performed: number of CertifHy EU RFNBO Voluntary Scheme Audits conducted by the Certification Body during the last calendar year
- Certificates issued: the number of CertifHy EU RFNBO Voluntary Scheme certificates issued
- Non-conformities, corrective actions and detected risks: a summary of significant Audit findings and respective corrective actions as well as risks which have been detected during project and internal Audits or risks in relation to the CertifHy EU RFNBO Voluntary Scheme
- Certification Body accreditation or recognition status: the status of the Certification Body's accreditation or recognition
- Any other issues the Certification Body assesses to be relevant for reporting to the CertifHy Scheme Operator

The objective of the annual report is to identify weaknesses, to prevent incorrect or insufficiently substantiated information and harmonise the auditing quality of the Certification Bodies active in the CertifHy EU RFNBO Voluntary Scheme. The CertifHy Scheme Operator is entitled to use this information to fulfil its reporting obligations to the European Commission and to competent national authorities.

As part of internal monitoring process of the CertifHy EU RFNBO Voluntary Scheme, Certification Bodies must submit all Audit reports, the time spent on CertifHy EU RFNBO Voluntary Scheme Audits, and GHG emission calculations to the CertifHy Scheme Operator.



5.4 Documentation and handling of information

Certification Bodies shall establish a documentation management system that addresses each of the following elements:

- a) General management system documentation (e.g. manuals, policies, definition of responsibilities)
- b) Control of documents and records
- c) Management review of management system
- d) Internal auditing/internal monitoring
- e) Procedures for identification and management of non-conformities
- f) Procedures for taking preventive actions to eliminate the causes of potential non-conformities

Documentation shall be kept for a minimum of 5 years, or longer if required by the relevant national authority.

Certification Bodies must accurately and rigorously document all Audits conducted under the CertifHy EU RFNBO Voluntary Scheme. This must include, at a minimum, the following information: names, addresses, registration numbers, CertifHy EU RFNBO Voluntary Scheme Audit Checklist template used during the Audit, Audit reports and Summary Audit Reports of the audited entities. The documentation system must adhere to high security standards, and ensure completeness and transparency. Certification Bodies must keep this information for at least 5 years, or longer if required by the relevant national authority. The documentation must be organized in a manner that allows the CertifHy Scheme Operator to verify the Audit results and records at any time.

The Certification Body must ensure that the applicable CertifHy EU RFNBO Voluntary Scheme Audit Checklist template is valid at the time of the Audit are used for each Audit conducted. An Audit report must be prepared for every Audit performed, detailing the emissions recorded at the audited site. The CertifHy Scheme Operator provides a template for such an Audit report and will inform Certification bodies or any updates to this template.

The Audit reports are provided exclusively to the CertifHy Scheme Operator and the Economic Operator that requested the certification. If an Economic Operator switches to another approved Certification Body for an Audit, the original Certification Body is required to supply the necessary data to the new Certification Body if that data is not already available.

5.5 Risk Management

Certification Bodies must apply Chapter 8 “Quality and Risk Management” from the CertifHy EU RFNBO Scheme Document.

The Certification Body’s risk management process and procedures must ensure that all operations and production devices under the CertifHy EU RFNBO Voluntary Scheme are audited at sufficient intervals and with adequate intensity. This is intended to ensure the greatest possible reliability in the implementation of the requirements of the CertifHy EU RFNBO Voluntary Scheme.

During any certification Audit, the Auditor must carry out a risk evaluation or risk assessment as set out in Chapter 8 “Quality and Risk Management” from the CertifHy EU RFNBO Scheme Document. The result of the risk evaluation, based on the



Economic Operator self-assessment, drives the intensity of the Audit and influences the sample size that will be taken into consideration in the Audit process.

The initial Audit of a new Economic Operator or a re-certification of an existing Economic Operator under a revised regulatory framework shall always be on site and shall as a minimum provide reasonable assurance on the effectiveness of the Economic Operators' internal processes. This means that Economic Operators cannot make claims about the sustainability characteristics of individual consignments of RFNBOs under CertifHy EU RFNBO Voluntary Scheme before the construction of the plant has been finalised and the plant is fully operational. Audits must be based on actual data from the facility. Depending on the risk profile of the Economic Operator, a limited assurance level can be applied on the veracity of its statements. Based on the results of the initial Audit, Economic Operators who are considered low risk may be subject to subsequent limited assurance Audits. Limited assurance can be applied when the risk analysis according to Chapter 8.4.2 of the CertifHy EU RFNBO Scheme document highlight only "low" risk levels.

The Certification Body shall also have procedures in place to ensure that the same Auditor does not conduct Audits (certification and, if applicable, surveillance Audits) of the same Economic Operator for three consecutive years.

5.6 Issuance, Termination and Withdrawal of Certificates

The CertifHy Scheme Operator provides templates for its certificates which must always be used. If a Certification Body intends to adjust the layout of the template, such adjustments must receive prior approval by the CertifHy Scheme Operator.

The Certification Body must designate the entity (e.g. person or committee) responsible for making certification decision within the Certification Body. This entity must be qualified to make certification decisions (e.g. technical reviewer) and must not have participated in the evaluation or Audit process of the Economic Operator seeking certification. Following a positive certification decision, the Certification Body will issue a certificate using the most current version of the CertifHy EU RFNBO Voluntary Scheme certificate template.

A certificate can only be issued if an Audit has been conducted, all applicable CertifHy EU RFNBO Voluntary Scheme requirements have been met and the final Audit report indicates no Non-conformities. A certificate can only be issued to Economic Operators who have signed and accepted the latest applicable version of the CertifHy EU RFNBO Voluntary Scheme Terms of Use and hold a valid registration with CertifHy, and are not suspended from certification either by the CertifHy Scheme Operator or by another recognised certification Scheme Operator recognized under Revised Directive EU/2018/2001.

The Certification Body must issue a certificate no later than 60 calendar days after conducting the Audit of the Economic Operator. This period includes the 40-day period for the implementation of corrective measures if Non-conformities were detected during the Audit. The Certification Body may issue a certificate up to seven calendar days prior to the starting date of the validity period. This allows the Certification Body to issue a certificate prior to a public holiday or a non-workday, for example, ensuring that there is no gap between two certificates. In this case, the issuance date of the certificate differs from the date the certificate becomes valid (up to seven days later than the date of issuance). The validity period of a certificate



must not start before the certificate is issued, (i.e: prior to the date of issuance of the certificate). The Certification Body is responsible for the accuracy of a certificate it has issued until the certificate expires, is terminated (voluntarily) by the Economic Operator or withdrawn by the Certification Body.

If an Economic Operator chooses not to continue with the CertifHy EU RFNBO Voluntary Scheme certification, they may terminate the certification before the official validity period expires by notifying both the Certification Body that issued the certificate and the CertifHy Scheme Operator. The Certification Body is responsible for informing the CertifHy Scheme Operator of the end of the validity period. If a certificate is terminated prior to the end of its initial validity period, the CertifHy Scheme Operator will update the database of certificates on the CertifHy website accordingly upon receipt of the notice.

In case of serious violations or major or critical Non-conformities with CertifHy EU RFNBO Voluntary Scheme requirements by a certified Economic Operator, the Certification Body must withdraw the certificate and inform the CertifHy Scheme Operator accordingly. Withdrawn certificates will be published as such on the CertifHy website (see also the CertifHy EU RFNBO Voluntary Scheme document 'Grievance, Whistleblowing & Appeal procedure').

5.7 Data transmission

The Certification Body is obliged to provide sufficient documents to the CertifHy Scheme Operator for each Audit performed by the Certification Body in a timely manner. The obligation to forward Audit documents applies to all types of Audits (i.e. certification Audits, surveillance Audits) as well as Audits with a negative result (failed Audits).

Directly after issuing a certificate, the Certification Body must inform the CertifHy Scheme Operator about the certificate issued and forward the required documents to the CertifHy Scheme Operator. These documents in digital form include but are not limited to:

- The certificate including relevant annexes to the certificate (if applicable)
- The Audit Report and the Summary Audit Report
- The GHG calculation

The CertifHy Scheme Operator may request additional information or documents to be provided by the Certification Body, especially if this is deemed necessary to reduce the risk of fraud or improve the traceability or overall integrity of the scheme. Appropriate transitional periods for providing additional information or documents will be provided.

5.8 Sanctions

Non- conform behaviour by the Certification Body or its Auditors will be examined by the CertifHy Scheme Operator on a case-by-case basis with respect to the type and the level of Non-conformity. The CertifHy Scheme Operator may define the type and level of sanctions it may impose on the Certification Body (see also 'CertifHy Scheme Document').



5.9 Grievances and Appeals

Grievances and Appeals by Economic Operators related to Audits and other certification activities conducted by the Certification Body and its Auditors under the CertifHy EU RFNBO Voluntary Scheme should be handled by the Certification Body. Certification Bodies should have a procedure in place that should enable them to process Grievances and Appeals in an effective, timely, and professional manner.

Where Economic Operators cannot agree with the Certification Body on a Grievance or an Appeal, the issue shall be brought to the attention of the CertifHy Scheme Operator for resolution.

If the Certification Body intends to file Grievances or Appeals against decisions of the CertifHy Scheme Operator, the procedure for this is laid down in the CertifHy EU RFNBO Voluntary Scheme document “Grievances, Whistleblowing & Appeals Procedure”.



6. Requirements for Auditors

All Auditors must meet general requirements and have qualifications to be allowed to conduct CertifHy EU RFNBO Voluntary Scheme Audits.

Curriculum Vitae (CVs) of Auditors together with references, confirmations and/ or other relevant documents can serve as evidence of sufficient expertise, professional experience, and experience as an employee (Auditor) of a Certification Body. These are to be documented by the respective Certification Body, updated, and provided to the CertifHy Scheme Operator upon request. The CertifHy Scheme Operator is authorised, particularly in the case of missing documents or insufficient qualification of Auditors, to reject the application for registration of a Certification Body or to withdraw an existing approval.

6.1 General Requirements for Auditors

During any CertifHy EU RFNBO Voluntary Scheme Audit, the Auditor must:

- Identify and understand the activities and processes undertaken by the audited Economic Operator, its overall organization with respect to the CertifHy EU RFNBO Voluntary Scheme criteria and check the effective implementation of relevant control systems.
- Analyse the risks, which could lead to a material misstatement, based on the Auditor's professional knowledge and the information provided by the Economic Operator. That analysis shall take into consideration the overall risk profile of the activities, depending on the level of risk of the Economic Operator and the supply chain. The Audit intensity or scope, or both, shall be adapted to the level of overall risk identified, also based on plausibility checks of the production capacity of a plant and the declared quantities of produced fuels.
- Draw up a verification plan, corresponding to the risk analysis and the scope and complexity of the Economic Operator's activities and which defines the sampling methods to be used with respect to that Economic Operator's activities. The CertifHy EU RFNBO Voluntary Scheme Audit Checklist template may be used for this.
- Implement the verification plan by gathering evidence in accordance with the defined sampling methods, plus all relevant additional evidence, upon which the verifier's conclusion will be based.
- Request the Economic Operator to provide any missing elements of Audit trails, explain deviations, or revise claims or calculations before reaching a final conclusion.
- Verify the accuracy of data recorded by the Economic Operators or their representatives in the Union database.

If an Economic Operator was previously found to be in critical or major Non-conformity applies for Re-Certification, the Auditor shall bring this to the attention of all Voluntary Schemes in which the Economic Operator is currently participating, or to which it has applied for Re-Certification.

Thus, the following minimum requirements apply to all Auditors:

- A minimum of three years of work experience, including at least two years in the relevant scope of the Audit.
- At least three days of Auditor training based on the ISO 19011.



- The completion of two Audits in the last three consecutive years as an auditor-in-training under the direction and guidance of a senior Auditor.
- Knowledge in the handling, evaluation and assessment of plausibility of data sources.
- Technical knowledge and a good understanding of the audited activities of the Economic Operator relevant to the CertifHy EU RFNBO Voluntary Scheme, sufficient for identifying, assessing, and managing the risks during each Audit the Auditor performs.
- Good proficiency in English; where documentation to be audited is in another language, at least one member of the Audit team must be proficient in that language.
- A valid training certificate issued after the successful completion of an initial Auditor training program on CertifHy EU RFNBO Voluntary Scheme requirements as well as certificates on continuous training updates.
- Successful participation in continuous training measures and exchange of experiences for Auditors (at least one per year) and passing of qualifications required in this procedure.
- Personal and professional behaviour in the sense of ISO 19011 (e.g. ethical, open-minded, diplomatic, observant, perceptive, versatile, tenacious, decisive, self-reliant). Auditors should follow the seven “principles of auditing” (integrity, fair presentation, due professional care, confidentiality, independence, evidence-based approach, and risk-based approach) according to ISO 19011 when conducting CertifHy EU RFNBO Voluntary Scheme Audits.
- Auditors are not permitted to carry out any activities which may affect their independence or impartiality and specifically must not carry out any consultancy activities for the CertifHy EU RFNBO Voluntary Scheme Economic Operator whom they Audit for compliance with CertifHy EU RFNBO Voluntary Scheme requirements. Being involved simultaneously in consultancy and Audit of the same Economic Operator over the previous past 3 years would be considered a conflict of interest. Irrespective of this, all previous relationships should be assessed on a case-by-case basis, and the person may not be assigned to these tasks if a potential risk for a conflict of interest still exists.
- Auditors are not permitted to make final certification decisions regarding Audits they have performed themselves.

6.2 Specific required qualifications, experience, and training for RFNBO certification

- The Auditor must have a university or higher education qualification in a relevant technical subject matter, for example: process technology, energy management, environmental engineering, environmental and quality management, environmentally orientated process engineering, renewable energies.
- Auditors must demonstrate knowledge and prove their competencies in understanding Economic Operator set-ups and being able to identify sector specific risks associated with the Audit. This can be proven by, for example, a background in (environmental/ sustainable) chemistry, physics or engineering, previous working experience in a relevant sector, or conducting Audits for standards with a similar technical scope.
- The Auditors must be trained in the scope and for the certification of renewable and non-renewable hydrogen. Auditors must have competence in carbon footprint calculation and verification, either through education at university or technical college level, specific professional training, or professional experience.



- The Auditors must have specific skills necessary for conducting Audits related to the CertifHy RFNBO Scheme. This includes specific skills in carbon footprint calculation and verification in accordance with the methodology set out in Commission Delegated Regulation (EU) 2023/1185: a minimum of 2 years' experience in fuel life-cycle assessment.
- The Auditors must have specific skills for the chain of custody criteria laid down in Article 30, points (1) to (2) of Revised Directive EU/2018/2001, meaning experience in mass balance systems, supply chain logistics, bookkeeping, traceability, and data handling or a related field.

The Certification Body shall select and appoint the Audit team in accordance with ISO 19011, taking into account the competence needed to achieve the objectives of the Audit. The Certification Body shall document & evidence the competencies relevant to demonstrate compliance with the requirements above.

Further specific requirements are:

- Participation in the CertifHy EU RFNBO training and the successful passing of the training test, are mandatory before being appointed as Auditor. The CertifHy EU RFNBO training programs are built and designed in cooperation with the Certification Bodies and in accordance with their needs.
 - The CertifHy Scheme Operator will consult with Certification Bodies on their needs and requirements during meetings organised with the CertifHy Scheme Managers of the recognised Certification Bodies.
 - The CertifHy Scheme Operator will review survey responses following the completion of the training program by Certification Body auditors to continuously improve the training content and format.
 - The CertifHy Scheme Operator will reach out to Certification Bodies that are not yet recognised under the CertifHy RFNBO Voluntary Scheme to understand their needs and requirements.
- The training provides guidance to Certification Bodies on aspects that are relevant to the certification process. The training includes:
 - Explaining the basics on how CertifHy has implemented the EU legislation on RFNBO
 - Theoretical and technical elaboration and discussion of all requirements relevant when it comes to certification
 - Discussion of concrete case studies illustrating the practical application of these requirements.

This training is designed to supplement the information provided in the CertifHy RFNBO Scheme documents and to make sure, Auditors have the required knowledge and capabilities for a RFNBO certification Audit under CertifHy. When required, CertifHy may set up further trainings on various topics which may become mandatory for auditors as a result of updates to the regulatory framework or which may result from CertifHy's internal monitoring process.

The test is conducted digitally and examines core competencies taught in the training relevant for conducting Audits. Participants have 2 attempts to pass the test. If a participant does not successfully pass the test after the second attempt, the participant must repeat the training. Only after successful completion of the test will CertifHy issue the official attestation that confirms the successful participation in the training that allows the auditor to conduct the respective audits under the CertifHy EU RFNBO Voluntary Scheme. This also applies for the system manager for CertifHy appointed by each Certification Body.



- Participation in the CertifHy EU RFNBO training, including successfully passing the test included in the training, must be repeated at least every five years. The CertifHy Scheme Operator will keep a record of the Auditors who have participated in the training and passed the exam and if necessary, request appointed Auditors to participate in additional trainings or refresher training to remain eligible to carry out Auditing activities.
- Candidates must carry out at least two trainee Audits within a maximum of three consecutive years under the direction and guidance of an appointed Auditor for the hydrogen sector before being appointed as Auditors by the Certification Body.
- After the Auditors are appointed by the Certification Body, regular participation – at least once a year – in Certification Body training according to the CertifHy EU RFNBO Voluntary Scheme, including successfully passing the test included in the training, is mandatory from 2024 onwards.
- Each Auditor must carry out at least one Audit per calendar year from 2024 onwards, unless there is a justified exception due to long-term sick-leave, sabbatical or other (these will be examined on a case-by-case basis by the Certification Body) to verify whether training or updates are necessary in practice.



7. Change of Certification Body

Economic Operators may freely choose between Certification Bodies recognised by the CertifHy Scheme Operator to perform a certification according to the CertifHy EU RFNBO Voluntary Scheme, but shall not switch Certification Bodies too frequently.

Economic Operators may change from one Certification Body to another Certification Body for Re-Certification. In this case, specific requirements with regards to the integrity of the scheme must be met. The Certification Body is obliged to provide sufficient documents to the CertifHy Scheme Operator for each Audit performed by the Certification Body; this also applies to Audits with a negative result.

Certification documents must be forwarded to the CertifHy Scheme Operator in a way that they can be reviewed and processed by the CertifHy Scheme Operator without disproportionate effort.

If an Economic Operator changes the Certification Body twice within a period of five years, the Certification Body newly contracted by the Economic Operator shall apply a higher risk level for the next scheduled Audit, i.e. the risk level must be higher than the risk level applied for the previous Audit. It is the responsibility of the newly contracted Certification Body to take this requirement into account when conducting the risk assessment. They must also consider the certification history of the Economic Operator and the relevant Audit documents from the previous Audits.

In case an Economic Operator has already been certified according to the CertifHy EU RFNBO Voluntary Scheme and intends to become re-certified with a different Certification Body recognised by the CertifHy Scheme Operator, the newly contracted Certification Body must receive the relevant Audit documents and procedures from the previous CertifHy EU RFNBO Voluntary Scheme Audit. The Audit procedures and documents from the previous Audit must be considered during the re-certification process performed by the newly contracted Certification Body. The CertifHy Scheme Operator is obliged to provide the relevant Audit documents of the previous Audit to the newly contracted Certification Body. Both Certification Bodies (the new and the previous Certification Body) are obliged to cooperate in case of questions arising during the Re-Certification which concern the Audit history of the Economic Operator.

A Certification Body remains responsible for the certificates it has issued to Economic Operators until the certificates expire, are terminated by the holder or are withdrawn by the issuing Certification Body. Based on the contractual agreements between a Certification Body and an Economic Operator, a Certification Body may shorten the validity period of the issued certificate if the Economic Operator terminates the certification contract with the Certification Body.

One Certification Body cannot take over certificates issued by another Certification Body.