

SCS100

Manual

July 2024

一般財団法人 日本海事協会
NIPPON KAIJI KYOKAI

ClassNK



ClassNK SCS
Certification for CORSIA SAF

Revision History

No.	Issue date	Details of revision
0	2024.04.01	Newly issued
1	2024.06.06	Revised format of Quality Policy at 6.1.2
2	2024.07.03	Editorial change at Section 18

In case the requirements in ICAO-CORSIA documents are updated, and the ClassNK SCS manual has not been revised to reflect such updates yet, the updated requirements shall be applied during verification irrespective of the state of revision of the ClassNK SCS manual.

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1. Scope

This Manual is applicable to the management system operated by Nippon Kaiji Kyokai (hereunder ClassNK SCS) for CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes.

2. Applicable and Normative references

CORSIA document

This document is referenced in CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes, 2. ELIGIBILITY REQUIREMENTS, Table 1.

Requirements for SCS.

Normative references

Following ISO standards are referenced as informative guidance:

- ISO/IEC 17065 Conformity assessment — Requirements for bodies certifying products, processes and services
- ISO 19011 Guidelines for auditing management systems
- ISO/IEC 17029 Conformity assessment — General principles and requirements for validation and verification bodies
- ISO 14065 General principles and requirements for bodies validating and verifying environmental information
- ISO 14064-3 Greenhouse gases — Part 3: Specification with guidance for the verification and validation of greenhouse gas statements
- ISO/IEC 17011 Conformity assessment — Requirements for accreditation bodies accrediting conformity assessment bodies

3. Definitions

Accreditation. A third-party attestation related to a certification body conveying formal demonstration of its competence to carry out specific conformity assessment tasks (adapted from ISO 17011).

Accreditation bodies. Authoritative bodies that perform accreditation (ISO 17011).
Assurance system. A system of accreditation, certification, auditing processes and procedures maintained by a Sustainability Certification Scheme.

Auditors. Auditors plan, conduct and complete audits on behalf of the certification body. Responsibilities include designing risk-based audit and evidence-gathering plans, designing sampling procedures, evaluating the adequacy and sufficiency of evidence of compliance, identifying nonconformities, issuing a recommendation for or against certification and preparing an audit report.

Audits. Systematic, independent and documented processes for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled (adapted from ISO 19011:2011).

Certification bodies (CB). Third-party conformity assessment bodies (ISO 17065:2012) making certification decisions and issuing certificates.

Economic operator. Economic operators include feedstock producers, processing facilities, and traders.

Stakeholder. Individual or group that has an interest in any decision or activity of an organization (adapted from ISO 26000).

Sustainability Certification Schemes (SCS). Organizations that certify economic operators against the sustainability criteria, and ensure that economic operators calculate actual life cycle emissions values (if default values are not applied) using the agreed methodology. SCS define sustainability certification requirements, set requirements for certification bodies, auditors and accreditation bodies, and monitor effectiveness of the assurance system

4. Background

The 41st ICAO Assembly adopted a long-term global aspirational goal (LTAG) for international aviation of net-zero carbon emissions by 2050 in support of the UNFCCC Paris Agreement's temperature goal.

The LTAG report shows that Sustainable aviation fuel (SAF) has the greatest potential to reduce CO₂ emissions from International Aviation.

SAF is being pursued globally as an element of a comprehensive basket of measures to address aviation's impact on climate change and the environment. Use of SAF by the world's aviation industry has the potential to provide significant life-cycle reductions in aviation greenhouse gas emissions as well as reductions in air quality pollutant emissions.

Sustainability Certification Schemes (SCS) is established for the Organizations that certify economic operators against the sustainability criteria, and ensure that economic operators calculate actual life cycle emissions values (if default values are not applied) using the agreed methodology.

ClassNK SCS define sustainability certification requirements, set requirements for certification bodies, auditors and accreditation bodies in accordance with ICAO CORSIA requirements, and monitor effectiveness of the assurance system.

ClassNK is accredited to ISOs 17029, 14065, 14064-3, 17065 and is the sole ICAO-CORSIA verifier in Japan. Therefore, it has broad and deep experience of GHG verification and calculations and, being the CORSIA verifier of all Japanese airlines, is thoroughly knowledgeable about CORSIA regulations.

In accordance with the aforementioned standards to which ClassNK is accredited, ClassNK SCS has established a well-organized and transparent document management system, clear and efficient procedures for receiving and responding to complaints, and a system of at least annual independent reviews and audits of its management system for the sake of preventing all possibilities of the occurrence of errors and ensuring continuous improvement.

ClassNK SCS receives advice from the Stakeholder Engagement group, comprised of various global experts in industries, academia, the private sector, and NGOs.

5. ClassNK SCS document structure

The document structure of ClassNK SCS is composed of the following basic documents, in accordance with the "ICAO document CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes", to clearly reflect the roles and requirements of ClassNK SCS, Certification Bodies, Economic Operators, and Accreditation Board, as shown in Figure 1 below.

- SCS100- ClassNK SCS Manual
- CB100- Requirements for Certification bodies (separately prepared)
- EO100- Requirements for Economic operators (separately prepared)

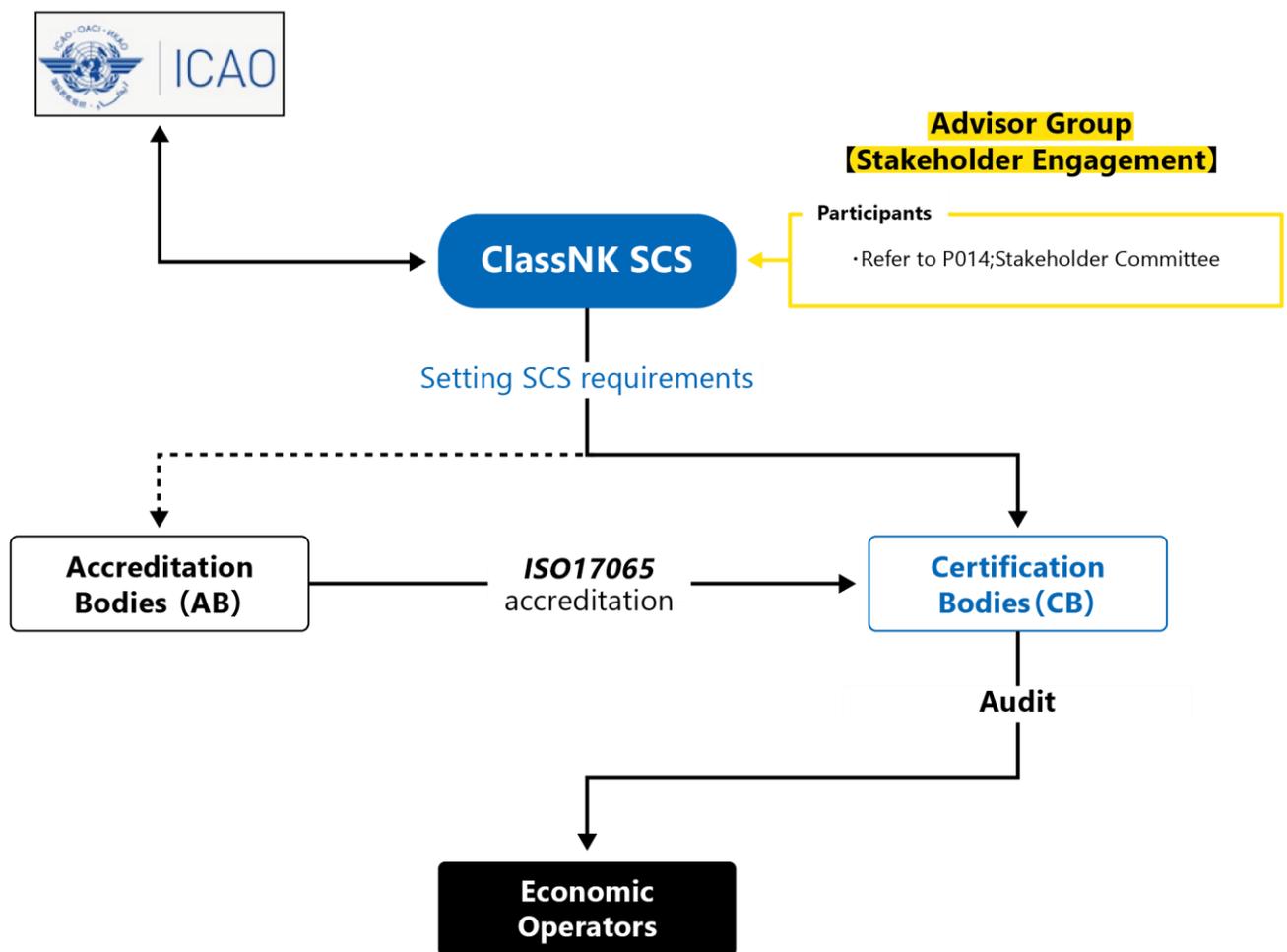


Figure 1: Relationship between the various stakeholders of ClassNK SCS

6. Documentation management

General management system documentation for ClassNK SCS CORSIA certification programme is based on the management system accredited by Japan Accreditation Board (JAB) for Greenhouse gas Validation and Verification according to the following ISO Standards;

- ISO/IEC 17029:2019
- ISO 14065: 2020
- ISO 14064-3: 2019

6.1 General requirements

6.1.1 Legal entity of ClassNK

Nippon Kaiji Kyokai (ClassNK) is a legal entity, that can be held legally responsible for all its SCS activities.

The legal status of ClassNK registered in Japan is as follows.

Nippon Kaiji Kyokai	4-7, Kioi-cho, Chiyoda-ku, Tokyo 102-8567, Japan
Chairman and President	Hiroaki SAKASHITA

6.1.2 Quality Policy

For SCS Activities

ClassNK SCS ensures the quality of the SCS activities by establishing, implementing and maintaining a quality management system for CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes (hereinafter referred to as the "SCS quality management system") with the aim of achieving the quality objectives and gaining the trust off client organizations and the Society.

As the Top Management with overall responsibility for the SCS activities, ClassNK SCS organize the "Impartiality Committee" consisting of representatives mainly from external organizations, to ensure the confidentiality, objectivity and impartiality, and shall reflect any views of the Impartiality Committee in the SCS activities.

Reference document;

P001	Impartiality Committee
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6.1.3 Management of impartiality

For SCS Activities

Sustainability Certification Schemes (SCS) activities shall be undertaken impartially. ClassNK SCS is responsible for the impartiality of its SCS activities and not allow commercial, financial or other pressures to compromise impartiality.

ClassNK SCS monitors its activities and its relationships to identify threats to its impartiality. This monitoring includes the relationships of its personnel.

If a threat to impartiality is identified, its effect shall be eliminated or minimized so that the impartiality is not compromised.

ClassNK SCS has commitment to impartiality as stated in 6.1.2.

ClassNK SCS has a publicly available commitment on ClassNK website that it understands the importance of impartiality in carrying out the SCS activities and manages conflicts of interest and ensures objectivity.

Review and decision are made by personnel different from those who carried out the SCS execution.

ClassNK SCS takes action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations.

Reference document;

P002	Management of Impartiality
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Since ClassNK SCS plans to act as both SCS and Certification Body, it will specify a requirement for appropriate separation between the functions of each to identify threats to its impartiality and establish the necessary firewalls.

ClassNK SCS monitors its activities and its relationships to identify threats to its impartiality. This monitoring includes the relationships of its personnel.

If a threat to impartiality is identified, its effect shall be eliminated or minimized so that the impartiality is not compromised.

6.1.4 Liability

ClassNK SCS is able to demonstrate that it has evaluated the risks arising from its SCS activities and that it has adequate arrangements (e.g. insurance or reserves) to cover liabilities arising from its activities.

6.1.5 Organizational structure

ClassNK SCS is organized and managed so as to enable it to maintain the capability to perform its SCS activities.

SCS activities is structured and managed so as to safeguard impartiality. ClassNK SCS documents the organizational structure, duties, responsibilities and authorities of management and other personnel involved in the SCS activities and any committees as shown in the Organization chart of ClassNK SCS.

Reference document;

P003	Organizational structure with responsibility, authority
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6.1.6 Resource requirements

General

ClassNK SCS has accesses to personnel, facilities, equipment, systems and support services that are necessary to perform its SCS activities.

Personnel

ClassNK SCS has a sufficient number of competent persons to perform its SCS activities.

ClassNK SCS requires all personnel involved in SCS activities to enter into a legally enforceable agreement by which the personnel commit themselves to the following:

- a) to comply with the processes and instructions of ClassNK SCS, including those relating to impartiality and confidentiality;
- b) to reveal any situation known to them that can present them or ClassNK SCS with a perceived or actual conflict of interest.

ClassNK SCS uses this information as input into identifying threats to impartiality raised by the activities of such personnel, or by the persons or organizations related to them.

All personnel of ClassNK SCS, either internal or external, that could influence the SCS activities, acts impartially.

Personnel, including any committee members, contractors, personnel of external bodies, or individuals acting on ClassNK SCS 's behalf, shall keep confidential all information obtained or created during the performance of the SCS activities.

ClassNK SCS communicates to personnel the duties, responsibilities and authorities.

Management process for the competence of personnel

ClassNK SCS has a process for managing competence of its personnel involved in the SCS activities.

In addition, ClassNK SCS establishes, implements and maintains a process for:

- a) defining required competencies for SCS's auditors (ref. 7 in this Manual);
- b) ensuring that there is access to relevant internal or external expertise for advice on specific matters relating to the SCS activities.

ClassNK SCS has documented information demonstrating competence of its personnel involved in the SCS activities. This includes relevant education, training, experience, performance monitoring, affiliations, and professional status.

Reference documents;

P004	Competence of personnel
D001	List of Personnel (External and Internal)

6.2 Control of documents

ClassNK SCS controls document to ensure that it is:

- a) available and suitable for use, where and when it is needed, and
- b) adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity).

For the control of document, ClassNK SCS addresses the following activities, as applicable:

- a) distribution, access, retrieval and use;
- b) storage and preservation, including preservation of legibility;
- c) control of changes (e.g. version control);
- d) retention and disposition.

Document of external origin determined by ClassNK SCS to be necessary for the planning and operation of the management system is identified as appropriate and is controlled.

Document retained as evidence of conformity shall be protected from unintended alterations.

Document related to Sustainability Certification Schemes

When ClassNK SCS issues document related to Sustainability Certification Schemes, the following procedures are followed:

1) Document Issuance

If there is a new development of system documents or a fundamental change to existing system documents that affects the certification of CORSIA Eligible Fuels, ClassNK SCS publishes the relevant documents on the ClassNK website to collect

feedback from stakeholders, and seek public comments for a period of 60 calendar days.

ClassNK SCS publishes the received public comments and the results of the deliberations on the website. If necessary, before issuing the final version of the document, ClassNK SCS analyzes and consider the feedback received during the public comments period. This includes setting an appropriate transition period for all stakeholders to adjust or adapt to fundamental changes in the document's effective date or existing system requirements.

Collection and publication of stakeholder feedback and consultation are not applicable when adjustments or changes to the system are limited and do not affect compliance with CORSIA requirements.

Reference document;

P005	Document control
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6.3 Control of records

ClassNK SCS maintains and manages records related to SCS Annual Report content to ICAO and SCS activities to demonstrate that the SCS activities have been carried out in accordance with the requirements of this document and ICAO Document.

ClassNK SCS prepares the List of Records.

ClassNK SCS maintains the records securely and confidentially, including during their transport, transmission, or transfer.

ClassNK SCS retains the records for a minimum of 10 years.

Reference document;

P006	Control of records
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6.4 Management system requirements

6.4.1 Management review

ClassNK SCS's management reviews its management system at planned intervals, normally in March every year, in order to ensure its continuing suitability, adequacy and effectiveness, including the stated policies and objectives related to the fulfilment of this document.

The inputs to management review shall be recorded and shall include information related to the following:

- a) changes in internal and external issues that are relevant to ClassNK SCS;
- b) fulfilment of objectives;
- c) suitability of policies and procedures;

- d) status of actions from previous management reviews;
- e) outcome of recent internal audits;
- f) corrective actions;
- g) changes in the volume and type of the work;
- h) client and personnel feedback;
- i) complaints and appeals;
- j) effectiveness of any implemented improvements;
- k) adequacy of resources;
- l) results of risk analysis;
- m) other relevant factors, such as monitoring activities and training.

The outputs from the management review shall record all decisions and actions related to at least:

- a) the effectiveness of the management system and its processes;
- b) improvement of ClassNK SCS's activities related to the fulfilment of the requirements of this document;
- c) provision of required resources;
- d) any need for change.

Reference document;

P007	Management review
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6.4.2 Internal audits

ClassNK SCS conduct internal audits at planned intervals, normally in December every year to provide information on whether the management system:

- a) conforms to:
 - CORSIA Eligibility Framework and Requirements for Sustainability Certification Schemes 2. ELIGIBILITY REQUIREMENTS, Table 1. Requirements for SCS
 - ClassNK SCS SCS's own requirements for its management system
 - the requirements of this document;
- b) is effectively implemented and maintained.

ClassNK SCS:

- a) plans, establishes, implements and maintains an audit programme including the frequency, methods, responsibilities, planning requirements and reporting, which shall take into consideration the importance of ClassNK SCS's activities concerned, changes affecting ClassNK SCS and the results of

- previous audits;
- b) defines the audit criteria and scope for each audit;
 - c) ensures that the results of the audits are reported to relevant personnel;
 - d) implements appropriate correction and corrective actions without undue delay;
 - e) retains records as evidence of the implementation of the audit programme and the audit results.

ClassNK SCS ensures that its internal auditors do not audit their own work.

Reference document;

P008	Internal audit
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6.4.3 Corrective action

ClassNK SCS establishes processes for identification and management of nonconformities in its activities. ClassNK SCS also, where necessary, take actions to eliminate the causes of nonconformities in order to prevent recurrence. Corrective actions shall be appropriate to the impact of the problems encountered. The processes shall define requirements for:

- a) identifying nonconformities (e.g. from valid complaints and internal audits);
- b) determining the causes of nonconformity;
- c) correcting nonconformities;
- d) evaluating the need for actions to ensure that nonconformities do not recur;
- e) determining and implementing in a timely manner, the actions needed;
- f) recording the results of actions taken;
- g) reviewing the effectiveness of corrective actions.

Reference document;

P009	Corrective action
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7. Audit competencies

ClassNK SCS describes the specific audit competencies requirements for CB's auditors in; "CB100 Requirements for Certification bodies_6 Resource requirements_6.1 CB's personnel and 6.2 Resources for evaluation"

And

"P010 Competencies requirements for CB's auditors".

Reference document;

CB100	Requirements for Certification bodies
P010	Competencies requirements for CB's auditors

8. Group auditing methodology

ClassNK SCS describes specific requirements to CB on the Group auditing in “CB100 Requirements for Certification bodies _7. Process requirements_7.1 General_ Group auditing” and

“A001 APPENDIX 1 Group auditing requirements”

for the following elements:

- a) Risk-based sampling of units within a group audit, including minimum sample size –and the threshold for non-compliance.
- b) Group management.
- c) Process and conditions to join a group.

Reference document;

CB100	Requirements for Certification bodies
A001	APPENDIX 1 Group auditing requirements

9. Non-compliance with certification requirements

ClassNK SCS has established the procedures in "CB100 Requirements for Certification bodies _ 7.11 Termination, reduction, suspension or withdrawal of certification" for addressing when a certified economic operator is found to not comply with the certification requirements.

This includes:

- Procedures for withdrawing or suspending certificates and the circumstances under which this occurs.
- Procedures to ensure that any non-conformities that do not lead to immediate withdrawal or suspension of the certificate are corrected.

ClassNK SCS makes sure that the above procedures available to economic operators in its website.

Note; In most cases, the suspension would not exceed six months.

ClassNK SCS is informed by the CB and Economic Operators of non-compliance affecting the quality of the certified products. ClassNK SCS monitors the progress. Special audit may be carried out by SCS Auditors at the site of Economic Operators.

Reference document;

CB100	Requirements for Certification bodies
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10. Monitoring and system review

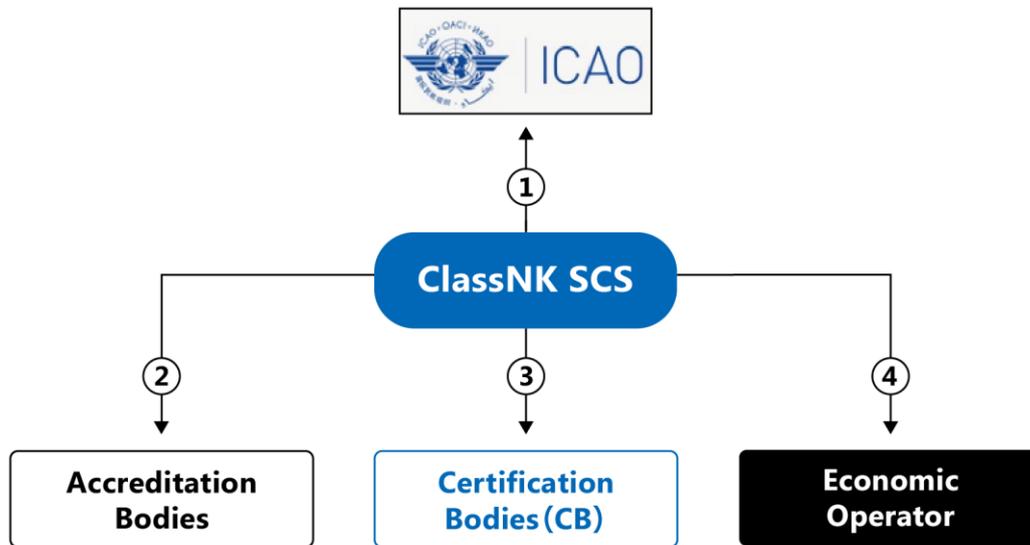
ClassNK SCS monitors economic operators, CB and accreditation body to ensure its continuing integrity, adequacy, and effectiveness every year.

ClassNK SCS reviews CORSIA certification programme based on the result of monitoring.

Review of the CORSIA certification programme is planned every year and after significant changes to the CORSIA requirements as specified by ICAO, as well as in response to complaints received, where necessary.

ClassNK SCS uses the results of the review to improve its assurance system and maintains records of any corrective actions taken.

The figure below shows the monitoring and reporting system.



Reporting requirements for SCS Annual Report to ICAO

①	Field 1~9	Annual Report to ICAO
②	Field 3	Accreditation body assurance
③	Field 1	List of audits of economic operators executed during the reporting year
	Field 2	Certification body assurance
	Field 5	Certification Bodies and robustness of the scheme
④	Field 7	Economic operator's information
	Field 8	Type of CORSIA eligible fuel certified
	Field 9	Batch information of CORSIA eligible fuel certified

Reference document;

P011	Monitoring and system review
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11. Transparency

ClassNK SCS ensures that the following information is made publicly available on a website:

- The list of economic operators that are certified under its CORSIA certification programme, including the start and expiry dates of each certificate, and those who no longer participate. Information on the withdrawal or suspension of certificates must be published immediately after the decision has been made.
- The latest version of ClassNK SCS requirements.
- The list of CBs that are permitted to conduct audits within the CORSIA certification programme, as well as any CBs that are no longer permitted to conduct audits within the programme and those that are temporarily suspended.
- Publication of contact details for ClassNK SCS e.g. telephone number, email address and correspondence address.
- The names of any other eligible SCS that the subject ClassNK SCS recognizes within its CORSIA certification programme.

Reference document;

P012	Information available in public
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12. Annual reports

ClassNK SCS submits annually a report to ICAO (officeenv@icao.int) that includes following relevant information on an annual basis by 1 May of the year following approval according to Reporting requirements for SCS Annual Report to ICAO.

- Field 1: List of audits of economic operators executed during the reporting year
- Field 2: Certification body assurance
- Field 3: Accreditation body assurance
- Field 4: Provide public location (e.g., webpage link) of information on ClassNK SCS
- Field 5: Certification Bodies and robustness of the scheme
- Field 6: List of system documents updated within the reporting year
- Field 7: Economic operator's information
- Field 8: Type of CORSIA eligible fuel certified
- Field 9: Batch information of CORSIA eligible fuel certified

ClassNK SCS collects the information required to fulfil this reporting obligation following 10. Monitoring and system review in this document.

ClassNK SCS keeps detailed information in the records submitted by the CB and economic operators for a minimum of 10 years about the calculation of actual values within their system in particular information related to the baseline and underlying assumptions used for the calculation of any emission reduction credit and provide this information to ICAO on request, in line with the ICAO document entitled, "CORSIA Methodology for Calculating Actual Life Cycle Emissions Values.

13. Risk management plan

ClassNK SCS considers the risks and opportunities associated with the SCS activities in order to:

- a) give assurance that the management system achieves its intended results;
- b) enhance opportunities to achieve the programme and objectives of ClassNK SCS;
- c) prevent, or reduce, undesired impacts and potential failures in SCS activities;
- d) achieve improvement.

ClassNK SCS utilizes a 'Risk and Opportunity Analysis Sheet' to collect and analyze information related to risks and opportunities, and plans initiatives for these risks and opportunities. The created 'Risk and Opportunity Analysis Sheet' is used as input for the management review, and the considered risk and opportunity related activities are clarified as output of the management review to be integrated and implemented in the management system. The effectiveness of the risk and opportunity related activities is periodically reviewed in line with progress, and confirmed at the next management review."

Reference document;

P013	Risk management plan
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14. Accreditation of certification bodies

ClassNK SCS uses an accreditation body complying with ISO 17011 to ensure that certification body requirements listed herein are implemented by the certification bodies.

ClassNK SCS annually assesses the effectiveness of the accreditation mechanism as part of their system review in accordance with 10. Monitoring and system review in this document.

ClassNK SCS ensures that the accreditation body has the following competencies:

- a) Knowledge of the ICAO documents and materials related to CORSIA eligible fuels and the SCS CORSIA certification programme requirements.
- b) Competence to review sampling protocols and practice, where this is undertaken by the Certification Body.
- c) Competence to review assessment of groups under group auditing procedures, where this is permitted by ClassNK SCS and undertaken by the Certification Body.

ClassNK SCS signs an Agreement with an accreditation body to achieve the above objectives, and conducts an annual exchange of opinions with the accreditation body.

Reference document;

D002	Agreement for ClassNK and Accreditation Body
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15. Stakeholder engagement

ClassNK SCS has a process for incorporating stakeholder input relevant to the CORSIA sustainability criteria and adequate to the scope and scale of the operation.

Stakeholder can include:

- non-governmental organizations;
- consumers and other members of the public.

and consist of following members.

- Experts with academic and practical knowledge
- Environmental NGO/NPO
- Airlines association
- ClassNK SCS.

Stakeholder committee meeting is timely held according to the "P014 Stakeholder Committee".

Reference document;

P014	Stakeholder Committee
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16. Complaint procedure

ClassNK SCS receives, evaluates and resolves complaints.

The process for handling complaints shall include at least the following:

- a description of the process for receiving, substantiating, investigating the complaint, including reporting relevant information, to the oversight body or certification body, as appropriate and deciding what actions are to be taken in response;
- tracking and recording the complaint, including the actions undertaken to resolve it;
- ensuring appropriate action is taken.

ClassNK SCS receiving the complaint is responsible for gathering all necessary information to determine whether the complaint is substantiated.

Whenever possible, ClassNK SCS acknowledges receipt of the complaint, and provide the complainant with the outcome and, if applicable, progress reports.

A description of the process for handling complaints shall be available to any interested party.

Upon receipt of a complaint, ClassNK SCS shall confirm whether the complaint relates to its SCS activities and, if so, shall resolve the complaint.

Investigation and resolution of complaints shall not result in any discriminatory actions.

The resolution of complaints shall be made by, or reviewed and approved by, individuals not involved in the complaint in question. Where resources do not permit this, any alternative approach shall not compromise impartiality.

With respect to fraud or potential fraud, "IAF ID 15:2023 Dealing with Fraudulent Behaviour" should be referred if ClassNK SCS, accreditation body, CB or economic operators are involved in fraudulent behaviour.

Obligations to the party concerned can be broadly represented as:

- Report instances of fraudulent behaviour
- Investigate any allegations made against their certified clients and take timely actions to suspend or withdraw certification if necessary
- Verify the implementation of measures taken by their certified client.

ClassNK SCS responds to requests for information from the Committee on Aviation Environmental Protection (CAEP) Sustainability Certification Schemes Evaluation Group (SCSEG).

17. Transparency on Greenhouse Gas (GHG) reporting and accounting

ClassNK SCS will provide any information required by the relevant national authority related to GHG reporting.

18. Application of sustainability criteria

ClassNK SCS have a CORSIA certification programme with certification limited to the currently approved CORSIA sustainability criteria and SCS eligibility requirements as stated in "A002 Application of sustainability criteria".

However, if ClassNK SCS would chooses to offer an additional, more stringent or comprehensive certification programme that applies at least the CORSIA sustainability criteria as well as other principles/criteria in the future, this certification programme will be clearly named and described to indicate that it includes components beyond the minimum required by ICAO.

The different approaches will be presented equally without prejudice to the selection of the certification programme by the economic operator.

Reference document;

A002	Application of sustainability criteria
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