

⇒ Objective

This document sets out the guidelines to be followed by Nova Cert for handling complaints, appeals and disputes in accordance with ISO 17029:2019, ISO 14065:2020 and other accreditation guidelines.

⇒ Scope of the procedure

Applies for the appeals regarding a validation/verification opinion, findings, or audit criterion and for any type of complaint. The procedure also applies for the analysis and decision of complaints and análisis and decisión of disputes.

⇒ Reference Documents

- ISO 17029:2019
- ISO 14065:2020
- A6.4-STAN-ACCR-001, Last version available

⇒ Template summary table

Activity	Template
Appeals, Complaints and Disputes tracking log	AC-01

⇒ Development

Tracking and Register of Complaints, Disputes and Appeals

NOVA CERT maintains a single consolidated register, AC-01 “Appeals, Complaints and Disputes Tracking Log”, to track every appeal, complaint and dispute from reception to closure. For each case, AC-01 shall record, at a minimum: a unique case ID; the type of case (appeal, complaint or dispute); the date received; the responsible person(s); the applicable response deadline; the validity determination; the current status; the date and content of any progress report(s) sent; the actions undertaken; the final decision; and the closure date. The Quality Coordinator shall update AC-01 within 2 business days of any status change and shall review it as an input to the Management Review (PRO-02).

1. Appeals

1.1. Appeal submission

Clients have the right to disagree with Nova Cert decisions regarding the validation and verification service. To file an appeal, the client shall send an email with the following information:

- Project name
- Decision being appealed
- Detailed explanation of why the decision is being appealed
- Annexes to support the appeal.

Appeal validity criteria

Upon reception of the appeal in the email info@nova-cert.com, the CEO shall confirm that the appeal is valid before it is deeply reviewed. An appeal is valid when it:

- a) Relates to a validation/verification opinion, finding, or audit criterion issued by NOVA CERT;
- b) Is submitted by the client or activity participant of the relevant service, or their authorized representative;
- c) Is submitted within the time frames specified in the table below; and
- d) includes, at a minimum, the project name, the decision being appealed, and a detailed explanation of the grounds for the appeal. If the appeal does not meet these criteria, the CEO shall inform the appellant in writing of the specific criterion not met and, where correctable, provide an opportunity to resubmit within the applicable time frame.

The appeal must be done within the following time frames. These time frames must be clearly stated in the proposal and agreement:

Item to be appealed	Time to submit appeal
Issuance of validation/verification opinion	15 business days
Issuance of a nonconformity or a lead auditor's decision to not close a nonconformity.	5 business days

Specific audit criteria added to the audit plan that was not contemplated in this agreement.	3 business days
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1.2. Acknowledging receipt

The Operations Manager shall send an email to the client with the following information:

- Confirmation of the reception of the appeal with the Contact details of the personnel handling the appeal.
- Inform that the appeal treatment will not result in any form of discrimination actions towards the client, and that Nova Cert understands that the client has the right to disagree with the DOE's decisions.
- Confirm that the review, analysis and decision of the appeal shall not be carried out by the individuals directly involved in the subject of the appeal.
- Estimated time for an official response of the DOE, that should be no longer than 10 business days upon reception of the appeal.

This email must be sent no longer than 2 business days upon reception of the appeal.

1.3. Appeal Analysis and Response

An independent appeal panel shall be considered for the analysis of the appeals, the members of the panel shall include:

- Quality coordinator.
- A technical expert with knowledge on the technical area of the project.
- Financial coordinator.

Persons engaged in the appeal process shall differ from those who conducted the validation or verification/certification, including the technical review and final decision-making.

The Independent Appeal Panel shall review the appeal with all the support annexes and provide the client with a response in no longer than 10 business days.

The record of the analysis of the appeal must be done in the **AC-01 "Appeals, Complaints and Disputes Tracking Log"** template.

If the analysis of an appeal is expected to exceed the 10 business day response estimate communicated at reception, the Operations Manager shall send the appellant a written progress report before that estimate elapses, and every 10 business days thereafter until a final response is issued.

During the investigation, all information is handled with strict confidentiality. Documents will be stored in the iCloud. The disputants identify will not be disclosed without their consent, unless required by law. The submission, investigation, and decision on appeals shall not result in any discriminatory actions against the appellant. The investigation shall ensure decisions take into account all relevant information available and gathered. The Independent Appeal Panel shall not restrict its review to evidence initially submitted by the appellant.

When the appeal investigation identifies a nonconformity or system gap, the following actions shall be triggered:

1. Quality Coordinator raises a Nonconformity;
2. Root cause analysis is conducted;
3. Corrections (immediate) and corrective actions (preventive recurrence) are identified and documented;
4. Systemic gaps escalated to management review as continual improvement inputs;
5. Effectiveness verified by Quality Coordinator.

Final decision of the investigation shall be made by the independent appeal panel.

*Note: The DOE shall inform the appellant of the independent appeal panel's decision. In cases where the appellant is not satisfied with the decision, the DOE shall inform the appellant that it has the option of making a complaint to the Supervisory Body. (Just for the A6.4 crediting mechanism).

2. Complaints

2.1. Complaint submission

Any stakeholder has the right to file complaints when they feel that poor service is being provided by the DOE, or when the expectations agreed in the proposal and legal agreement is not being met, either in relation to time or quality of service. Complaints decisions shall not have an impact on the result of validation/verification services. If so, an appeal shall be submitted by the stakeholder.

To file a complaint, the stakeholder shall send an email with the following information:

- Project name
- Detailed explanation of the complaint and why are the stakeholders' expectations not being met.
- Annexes to support the complaint, if applicable

Complaint validity criteria

Upon reception of the appeal in the email info@nova-cert.com, the CEO shall assess whether the complaint is valid before it is forwarded for analysis. A complaint is valid when it:

- a) Concerns the quality of NOVA CERT's service or non-fulfilment of the expectations agreed in the proposal and legal agreement;
- b) Is not anonymous, frivolous, or manifestly unfounded; and
- c) includes sufficient information (project name and a detailed explanation of the complaint) to allow an investigation. If the complaint does not meet these criteria, the CEO shall inform the stakeholder in writing of the specific criterion not met.

The stakeholder may submit a complaint any time.

2.2. Acknowledging receipt

The Operations Manager shall send an email to the stakeholder with the following information:

- Confirmation of the reception of the complaint with the Contact details of the personnel handling the complaint.
- Inform that the complaint treatment will not result in any form of discrimination actions towards the stakeholder.
- Confirm that the review and analysis of the complaint shall not be carried out by the individuals directly involved in the subject of the complaint.
- Estimated time for an official response of the DOE, that should be no longer than 10 business days upon reception of the appeal.

This email must be sent no longer than 2 business days upon reception of the complaint.

2.3. Complaint analysis

The Operations Manager and CEO shall review the complaint with all the support annexes and provide the stakeholder a response in no longer than 10 business days. A technical expert might be invited to analyze the complaint if the CEO deems appropriate. Personnel directly involved with the complaint shall not participate in the analysis and decision of it.

The record of the analysis of the complaint must be done in the **AC-01 “Appeals, Complaints and Disputes Tracking Log”** template. NOVA CERT will implement the measures required as a result of the investigation, these measures are not directly related to the complainant's expectations.

If the analysis of a complaint is expected to exceed the 10 business day response estimate communicated at reception, the Operations Manager and the CEO shall send the stakeholder a written progress report before that estimate elapses, and every 10 business days thereafter until a final response is issued.

During the investigation, all information is handled with strict confidentiality. Documents will be stored in the iCloud. The disputant's identify will not be disclosed without their consent, unless required by law.

2.4. Decision step: determination of actions in response to complaints

Following the complaint analysis, the Operations Manager and the Executive Director shall formally determine the actions to be taken in response to the complaint. This determination shall be documented in AC-01 as a distinct step, separate from the investigation narrative, ensuring transparency, consistency, and traceability of decisions in compliance.

The classification of response actions (correction, corrective action, or no action) follows the same categories defined in **section 3.4** of this procedure (Disputes – Analysis, Decision and actions). More than one category may be selected if appropriate.

The selected category, the rationale, and the specific actions to be taken shall be recorded in AC-01 and communicated to the complainant as part of the official response within the 10 business day period established in section 2.3.

3. Disputes

Availability of this Procedure

NOVA CERT shall make this procedure (PRO-05), including the dispute-handling provisions below, available to its clients and Article 6.4 activity participants upon request at any time. In addition, whenever a dispute arises in connection with an Article 6.4 project or PoA, NOVA CERT shall proactively provide the relevant activity participant(s) with a copy of, or access to, this procedure at the time the dispute is logged, without needing to be asked.

3.1. Acknowledging receipt

This is the formal entry point for any dispute. Any stakeholder (e.g., project proponents, local communities, NGOs) has the right to submit a dispute. This step ensures it is captured officially, the submitter receives confirmation, and a traceable record is created from the very beginning. Disputes must be submitted via email to info@nova-cert.com.

To file a dispute, the stakeholder shall send the email with the following information:

- Identification of the project
- Clear description of the objection
- Supporting evidence
- Identification of the complainant
- What was their affected interest

Within 5 working days, a formal acknowledgment is sent to the disputant, confirming receipt and informing the general process steps.

3.2. Preliminary assessment and validity

Not all submissions may constitute a valid, processable dispute. This step acts as a filter to ensure resources are focused on substantive issues that fall within the Body's mandate and scope, while respectfully declining those that are clearly out of scope, anonymous, or lack a basic foundation.

Upon receiving the dispute, the Quality Coordinator shall assess whether the dispute:

- Is directly related to a validation/verification activity of the body
- Is specific and substantive (not frivolous or vexatious)
- Presents verifiable initial evidence of grounds

If valid, an investigation is initiated. If not valid, the disputant is informed with clear justification. This decision can be appealed internally via a review request to the Quality Coordinator.

If the analysis of a dispute is expected to exceed 5 working days response estimate communicated at reception, the CEO shall send the stakeholder a written progress report before that estimate elapses, and every 10 business days thereafter until a final response is issued.

3.3. Investigation

The core fact-finding phase. This is conducted by an independent team to guarantee objectivity and avoid any conflict of interest. The principle of confidentiality is paramount here to protect all parties and encourage open provision of information.

The top management designates an investigation team composed of at least two people with appropriate technical and procedural competence. It will be verified that no members were involved in the process in question. The team gathers all relevant information:

- Project documentation
- Reports
- Communications (Email, WhatsApp, etc)
- Interviews, when applicable.

During the investigation, all information is handled with strict confidentiality. Documents will be stored in the iCloud. The disputant's identity will not be disclosed without their consent, unless required by law.

3.4. Analysis, Decision and actions.

This step transforms gathered facts into a formal conclusion and determines the necessary organizational response. It distinguishes between fixing the immediate problem (correction) and preventing it from happening again (corrective action), driving continual improvement.

The investigation team assesses the information against applicable requirements (Last version of the Article 6.4 crediting mechanism standard document, DOE procedures, among others) and prepares an investigation report including:

- Established facts
- Analysis against criteria
- Conclusion on the merits of the dispute
- Recommended actions.

The recommended actions shall be classified in the following:

- Correction: Immediate action to rectify an identified error
- Corrective action: Action to eliminate the root cause and prevent recurrence
- No action: If the dispute is deemed unfounded.

The top management reviews the report and approves the final decision and actions to be taken.

3.5. Communication and closure.

This ensures transparency and respect for the disputant by keeping them informed throughout the process and formally concluding the case. It also mandates communication with other affected parties (like the project proponent) if the Body's prior work is impacted by the decision.

For investigations taking more than 30 days, an interim update will be provided to the disputant.

Within a maximum period of 60 working days from receipt the disputant will be notified via email of the final outcome of the investigation, the decision taken and the reasoning behind it.

In case that the decision affects an issued report and statement, the client and the applicable authorities, if necessary, will be notified immediately, detailing the corrective actions applied.

3.6. Follow up, recording and improvement

This is the loop-closing and learning phase. It ensures decisions are implemented, creates an auditable history for accountability and oversight, and uses the information from disputes as a tool for strengthening the Body's management system and preventing future issues.

The Quality coordinator Will be the responsible for corrections/corrective actions and the verification on the effectiveness of the implementation (With approval of the top management). The entire dispute file shall be archived in the ICloud and securely for at least 7 years.