



# CSC Certification Body Summary Audit Report 2022/2023

## 1. Introduction

In January 2017, the Concrete Sustainability Council (CSC) launched its certification system for responsibly sourced concrete. The CSC is responsible for maintaining and developing the international certification system, including the auditing software ("Toolbox"). A CSC-accredited Certification Body (CB) is the client's key contact and contractual partner while undergoing certification. The CB manages the certification process: It assigns a qualified auditor to review the evidence provided by the client and to perform exemplary on-site audits. After the successful completion of the certification process, the CB issues the certificates and publishes them.

The CSC regularly conducts on-site audits of the Certification Bodies to ensure their compliance with the accreditation standards as set out in the CSC Technical Manual. This document is a summary report of the three CB audits performed in 2022 and 2023. The two years have been merged into one report to ensure the anonymity of the CBs under assessment.

## 2. Objective

The overall objectives of the audits are:

- Ensure the robustness of the CSC certification system.
- Ensure that the rigor to obtain CSC certification is comparable.
- Ensure that the certification process is comparable.
- Improve the CSC certification system by receiving feedback from the CB.

## 3. Execution

First, CSC assesses the organizational process of the certification body through the following sub-items:

1. Training of auditors
2. Audit workflow description
3. Audit workflow checklist
4. Participation in global/harmonization meetings
5. On-site audit (required numbers, auditing process)
6. Correct application of the CSC system

Next, the validations of the certification bodies are assessed in randomly selected CSC certification projects. This part is classified into the following sub-items:

1. Criteria: Prerequisites
2. Criteria: Exemplary Performance Credits
3. Criteria: Credits where publicly available information is required
4. Criteria: Credits where publicly available targets are required
5. Criteria: Supply chain credits
6. Criteria: Mandatory Credits

Lastly, the CSC provides a summary of both parts of the audit.



## **4. Key findings**

### **4.1. Organizational processes**

There were no shortcomings regarding the organizational processes. The audited Certification Bodies (CB) were able to provide valid accreditation certificates as outlined in the CSC CB agreement. Furthermore, the certification bodies were able to describe their process, how current and future auditors are trained and how new information is distributed within the company.

Additionally, the CBs could show their individual tools such as checklists or internal software. Regarding the on-site visits, the decision-making processes for choosing the plants to be audited could also be explained.

To ensure consistency in the implementation of the CSC system, the CB shall participate in harmonization meetings organized by the CSC. This obligation is fulfilled by the audited CBs.

### **4.2. On-site visits of plants being CSC certified**

In one case, there was an issue regarding the number of on-site visits of cement plants. In this specific case it was assumed by the Regional System Operator (RSO) that no on-site visit is needed if the number of plants being certified at the same time is only 1. The RSO assumed that the formula is only applicable to multi-site certifications (number of visited plants =  $0.7 \times \text{square root of the number of plants undergoing certification}$ ). CSC has pointed out this issue and has asked the RSO and CB to work out a solution together with the affected clients to resolve this issue. This issue affected two cement assessments according to Version 2.1. The issue was resolved by conducting the audits retroactively.

### **4.3. Chain of custody credit**

In several cases, it was noticed that the supplier calculator was used, but the printout (PDF) was not uploaded. To maintain transparency and clarity in the points awarded, it is mandatory that the required evidence is uploaded as specified. This topic will be addressed in the next CB Roundtable.

### **4.4. Checking the "Complies Checkbox"**

Clients are required to tick the box labeled "complies" only when they are confident that their evidence or explanation aligns with the specified criteria. There have been individual cases where clients have checked this box despite not providing any supporting evidence or explanatory text. The CSC audit highlighted the importance of considering this issue when validating evidence.

Furthermore, there was an additional instance where an error was identified. Points were incorrectly awarded when the validation text explicitly indicates that the client did not fulfill in this particular criterion. The CSC audit confirmed that this error did not affect the client's certification level, and as such, no adjustment to the certification was necessary. However, it was strongly emphasized that greater attention be exercised in



future assessments to prevent such errors from occurring again. This topic will be addressed in the next CB Roundtable.

#### **4.5. Credits where publicly available information is required**

In instances where the company's website is cited as supporting evidence, it is essential that the corresponding link is included in the explanatory field. In a few cases, the link was missing, resulting in a lack of immediate clarity during the CSC audit.

#### **4.6. Required information in the explanation field and/or linked evidences**

In certain instances, the explanation field remained empty, and no supporting evidence was attached to the criterion (neither uploaded nor linked). The CB has been advised of this issue and is urged to consider it in forthcoming certifications. It is imperative that, at the very least, the explanation field is filled out, or alternatively, relevant evidence must be uploaded and appropriately linked to the credit. It should be noted that in cases where this requirement was not met, the CB was still able to show the necessary evidence through means such as additional client certificates or on-site reports. This topic will be addressed in the next CB Roundtable.

#### **4.7. E5.03 Water Target**

In one case, points were granted due to the fact that no drinking water was being utilized. Instead, rainwater was used in the production of concrete. CSC has pointed out the concept of 'Conditionally Mandatory Criteria', which is described in the Auditor Note 01-02. If the plant is not located in a scarce area, the auditor can disable the required condition, but is not allowed to give points by default. It should be noted that in this case, it had no impact on the final certification level. The CB has been advised of this issue and is urged to consider it in forthcoming certifications. This topic will be addressed in the next CB Roundtable.

#### **4.8. M5.03 (EP) Participation to a benchmarking study**

This criterion only applies to the Netherlands and Italy. Please see the CSC annex V2.1. In one case points should not have been awarded here. However, immediate action was not required as it does not affect the certification level of the client. The CB has been advised of this issue and is urged to consider it in forthcoming certifications. This will be addressed at the next CB Roundtable to ensure that everyone is informed about the criterion M5.03.

#### **4.9. P5.01 Traceability of materials**

In one case a material list was notably absent. Instead, only a self-declaration was submitted as evidence. Although the necessary evidence was presented during the on-site inspection, regrettably, it was not properly documented in the CSC toolbox. It was requested to take this into account during the upcoming re-certification. The traceability of relevant materials must be proven by the client (e.g. via material list with suppliers).



#### **4.10. M5.02 Externally verified KPIs**

In a particular case, the sustainability report underwent external verification and was publicly accessible. However, it was noted that there was no explicit reference to ISAE 3000, signifying that the external verification adhered to its standards. No immediate action is necessary, as this discrepancy does not impact the current certification level (Silver). Nevertheless, it has been strongly advised to give attention to this matter during the upcoming re-certification process. This topic will be addressed in the next CB Roundtable.

### **5. Improvement opportunities for the CSC certification system**

Continuous improvement of the CSC certification system, including its toolbox, is an important lever to improve the sustainability performance of CSC certified plants. The CSC also took the opportunity of a feedback discussion with the certification body to find further potential for improvement for the certification system and its toolbox.

#### **5.1. Automatic notification about expiring certificates**

The CSC has implemented an automated notification system to alert clients of impending certificate expirations. One CB expressed interest in having a similar functionality for CBs to proactively reach out to their clients. This matter was deliberated during a CB Roundtable discussion. Ultimately, the proposal was rejected by the other CBs, who reasoned that a CB should have knowledge of when a client's certificate is due for renewal, obviating the need for automatic reminders.

#### **5.2. Note field for auditors**

Within the Toolbox, the "Explanatory Field" serves as a platform for clients to explain their compliance with specific criteria, while the "Validation Box" provides auditors with a means to give information on credit validation. In response to a suggestion from a CB, there was an initiative to introduce an additional note field exclusively intended for internal auditor communication, with the understanding that it would not be included in the printed auditor report. This proposal underwent thorough discussion in a CB Roundtable, resulting in its approval by the other CBs. Consequently, this feature has been successfully integrated into the CSC Toolbox.

#### **5.3. Mandatory CSC Harmonization meetings for CBs**

It was suggested to consider making the harmonization meetings mandatory. There should always be at least one representative from the certification body in attendance. In case of multiple absences (e.g., from the second or third occurrence), it might be worth contemplating potential consequences.

#### **5.4. "Signed by the senior management"**

Some evidences/documents must be signed by the senior management. It should be better defined regarding who holds the authority to sign: is it the Plant Manager, Site Manager or an individual officially listed in the commercial register?



## **6. CB compliance with accreditation standard**

The CSC audits conducted in 2022 and 2023 showed that the audited certification bodies adhere to the CSC-CB agreement and the criteria outlined in the CSC Technical Manual V2.1. These audits also affirmed the level of certification expertise possessed by the accredited CBs, particularly in concrete production and its chain of custody. The competence of CB auditors is upheld through rigorous internal training programs. Any minor non-conformities—those that do not impact the client's certification status—were collaboratively identified and promptly corrected or earmarked for the client's upcoming recertification. Additionally, opportunities for optimization were proposed and deliberated with other CBs, resulting in the successful implementation of some of these suggestions.

## **7. Continuation: CB audits in 2024**

The CSC will continue performing CB audits in 2024 in various markets.

Berlin, 07.11.2023

A handwritten signature in blue ink that reads "Andreas Tuan Phan". The signature is written in a cursive, flowing style.

Andreas Tuan Phan