

CSC Certification Body Summary Audit Report 2025

1. Introduction

The Concrete Sustainability Council (CSC) oversees and enhances the international certification system, including the management of the auditing software known as "Toolbox". CSC-accredited Certification Bodies (CBs) serve as the primary point of contact and contractual partners for clients seeking certification. CBs are responsible for managing the certification process, which includes:

- Assigning qualified auditors to assess client-provided evidence
- Conducting representative on-site audits
- Issuing and publishing certificates upon successful completion of the process

To maintain the integrity of the system, the CSC regularly conducts audits of CBs. These audits ensure CBs adhere to the accreditation standards outlined in the CSC Technical Manual. This report presents a comprehensive summary of the four on-site CB audits conducted in 2025, providing insights into the effectiveness and compliance of the certification process.

2. Objective

The overall objectives of the CSC 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 CBs.

3. Execution

First, CSC assessed the organizational process of the CBs, which included the topics (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) as well as (6) Correct application of the CSC system.

Next, the validations performed by the CBs were assessed in randomly selected CSC assessments. For this purpose, assessments from 2025 - and, where necessary, from 2024 when an insufficient number of projects were available - were selected, listed, and numbered. Using an online random generator, assessments were then randomly drawn. For each criterion outlined in the audit plan, typically two to four assessments were reviewed by the CSC. The criteria under review covered the following categories: (1) Prerequisites, (2) Exemplary Performance Credits, (3) Credits requiring publicly available information, (4) Credits requiring publicly available targets, (5) Supply Chain Credits, (6) Mandatory Credits, (7) Five additional random criteria selected by CSC, and (8) R-Module / CO₂-Module.

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

4. Key findings

4.1. Organizational processes

During the audits of the certification bodies (CBs), a consistently good to high level of structural organization, and compliance with applicable standards was observed. All CBs meet the requirements of the required standards ISO 17021 and/or 17065, and in some cases additionally e.g. ISO 17029, 14065, and 14064 and maintain well-developed systems for quality assurance, auditor qualification, and procedural documentation.

Organizational structure and quality assurance

Responsibilities for quality management, training, and supervision of auditors are clearly defined in all organizations. Assigned roles are documented and fully aligned with the requirements of the respective standards. Training and qualification measures are in place, either through internal programs or external courses, complemented by participation in national and international harmonization meetings.

Smaller organizations operate with flat hierarchies and clearly defined roles, while larger bodies maintain dedicated departments for certification, CSC-related work, and verification activities.

Auditor qualification and training

All auditors demonstrate the necessary competence and experience. Training records, competence matrices, and certificates are properly maintained and up to date. New auditors complete structured training programs that include shadowing, internal evaluations, and gradual development towards independent auditing. Continuing education on CSC-specific updates (e.g., new modules or toolbox updates) is conducted regularly and systematically integrated into internal procedures.

Audit processes and documentation

Certification processes are well defined and supported by clear allocation of responsibilities. Checklists and templates are used consistently and adapted to the specific requirements of the CSC system. Documentation is primarily handled digitally, predominantly through the CSC Toolbox, ensuring a good degree of traceability and consistency of audit results.

Selection of audits and international cooperation

The selection of sites to be audited is transparent and considers diversity, regional distribution, and rotation in re-certification cycles. Established procedures ensure smooth coordination in international audits, including language and organizational aspects, supported by close cooperation with partners abroad if necessary. Where applicable, international exchange is structured and regularly maintained through joint meetings and collaborative formats.

Interim conclusion on the topic of organizational processes

No major nonconformities regarding organizational aspects were identified during any of the audits. The certification bodies' processes are well organized, practical, and ensure good-quality auditing activities. Differences were observed mainly in organizational size, but not in system quality or compliance. Overall, the audited CBs demonstrate a robust level of professionalism, transparency, and sound understanding of the CSC requirements.

4.2.Chain of custody credit

In some 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 was re-addressed during the CB Roundtable on 11th of December 2025.

In connection with criterion C2.02 (coverage of the supply chain through CSC supplier certificates for aggregates) in one project the Platinum criterion was not fulfilled. The certification body was given a deadline to clarify with the client how to proceed – either by upgrading the relevant suppliers from Silver to Gold certificates or by downgrading the concrete certificate from Platinum to Gold. The final measurement was the latter (downgrade). This topic was addressed during the CB Roundtable on 12th of June 2025.

In one assessment it was discovered that one of the cement suppliers had lost its certification. According to the CSC Technical Manual, Chapter 1.9 "Certificate Validity and Withdrawal" (page 23/164), if a supplier fails to pursue recertification, the concrete plant's score must be adjusted downward by the score. In this specific case the score was significant, which could potentially result in a lower overall certification level for the assessed concrete plant. However, during the CSC audit, evidence was presented and it was clarified that the cement supplier in question is currently undergoing the recertification process (registered assessment). Given this information and the ongoing recertification efforts, no further actions are required at that time.

4.3.Points allocation

The correctness of the points allocation must also be verified. In some criteria, different scores can be selected by the client depending on the type of evidence provided, e.g., M2.02, M3.02, M4.02, M5, and E3.11. It must be ensured that the client has made the correct selection. This topic was addressed during the CB Roundtable meeting on 11 December 2025.

4.4.M4.02 Certified health and safety management system

At one company, the need for further verification was identified. For criterion M4.02, an assessment is underway to determine whether the Austrian Employee Protection Act (ASchG) and the requirements of the General Accident Insurance Company (AUVA) can be considered equivalent to a certified health and safety management system (e.g., ISO 45001). The Güteverband Transportbeton (GVTB), as the regional system operator in Austria, has been contacted for clarification.

4.5.E1.02 "Implementation of life cycle assessment"

In one assessment, an LCA tool integrated into the concrete producer's batching software— which has not yet been approved by the CSC— was used in addition to the accepted GVTB GWP Tool. The non-approved LCA tool reports lower CO₂ values. The Austrian RSO (GVTB) is currently reviewing whether this LCA tool, developed by an Austrian company, complies with the requirements of ISO 14025/14040 and can be formally recognized. If the tool does not meet the necessary standards, the project's CO₂ module will need to be downgraded from Level 3 to Level 2.

4.6.S4.09 External control of social standards and compliance with human rights

Being awarded "Employer of the Year" is not sufficient as standalone evidence for this criterion. This topic was discussed during the CB Roundtable on 11th of December 2025. However, it was agreed that if, in addition to the award, the client can provide supporting documentation—such as a report or assessment—demonstrating that the seven elements referenced in S4.09 are addressed, the evidence may be considered acceptable. The seven elements are: (1) Culture (includes "tone from the top"), (2) Objectives, (3) Risks (includes risk assessments, reporting, KPIs), (4) Programme (includes policy, whistleblowing, case management, sanctions), (5) Organization, (6) Communication (includes communication concept and trainings) as well as (7) Controls (including audits). The views expressed by the members of CB roundtable will be brought forward to the next CSC Technical Committee meeting.

4.7.M2.01 Documented Environmental Management System

As part of one assessment, an urgent need for action was identified under criterion M2.01. As evidence for the environmental management system, only the nomination of an environmental officer was submitted, which is insufficient. Since M2.01 is a minimum requirement for achieving a Silver or higher rating, this issue must be clarified with the client promptly. The client and CB could show evidence within the agreed timeframe. This topic was addressed during the CB Roundtable on 12th of June 2025.

4.8.P5. Traced Materials

As evidence, an exemplary material list providing an overview of the suppliers must be uploaded. During CSC CB audits, it was observed that some material lists include only the suppliers' names, while others also provide information on the supplied materials and their respective quantities. This discrepancy was discussed during the CB Roundtable on 11 December 2025. The majority expressed support for defining the material list as a document that includes supplier information along with details of the materials supplied and their quantities, as this data is also required for the category "Chain of Custody." The topic will be revisited in the next CB Roundtable.

4.9.E5.04 Water Target (Conditionally Mandatory Criteria)

In one specific case, points were given despite the absence of a defined water target. The mandatory criterion was correctly deactivated based on evidence that the plant is not located in a water-scarce area (E5.02). However, this does not mean that the client automatically qualifies for points. In such cases, E5.04 becomes optional. CSC reiterated the concept of "Conditionally Mandatory Criteria" during the CB Roundtable on 11 December 2025, as described in Auditor Note 01-02. If a plant is not located in a water-scarce area, the auditor may deactivate the required condition but must not award points by default. It should be noted that in this case, the issue had no impact on the final certification level. The CB has been informed of this matter and is requested to consider it carefully for future certifications.

4.10. C6.01 – Correct score calculation

In one assessment, certified steel reinforcement was evidently used; however, the client applied its own calculation method. During the CSC CB audit, it was pointed out that an official CSC Excel calculator and Guidance Note 07-02 are available for this purpose. As the deviation did not affect the overall assessment score, no further action was required. The topic will be discussed at the next CB Roundtable.

4.11. CO₂-Module

Another major nonconformity concerned the CO₂ module in one project. It was incorrectly assumed that a verified EPD was available. Since this was not the case, a plausibility check would have been required but has not yet been carried out. This issue was addressed and corrected without delay. Also, this topic was addressed during the CB Roundtable on 12th of June 2025.

4.12. R-Module

In one R-Module assessment for criterion R5.03, the required evidence was uploaded; however, additional documentation must be provided to demonstrate that "Aggregate No. 12" is indeed recycled material, as this is not evident from the testing report. The auditor has been requested to contact the client to obtain further information regarding the recycled aggregates used. The topic will be discussed at 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 bodies to find further potential for improvement for the certification system and its toolbox. These proposed changes aim to enhance the clarity, efficiency, and effectiveness of the CSC certification process, while also increasing its relevance and value to participating organizations. Improvements and feedback can also be provided during the any CB Roundtables.

5.1. Default settings in Toolbox navigation

When navigating back within the toolbox, previously selected search items should be retained. → Implemented in the Toolbox “Save the settings in the toolbox (filter function) when you return to the assessment page #24528”.

5.2. Filter function in the Toolbox

It was proposed to extend the filter function in the assessment Toolbox to allow multiple status selections simultaneously (e.g., “in progress” and “certified”). Link: <https://toolbox.csc.eco/assessment> → Addressed and will be dealt with “Filter Function in the Toolbox (assessments) #24527”

5.3. Additional requirements for certification bodies

Two certification bodies proposed requiring accreditation under ISO 17029 “Conformity assessment – General principles and requirements for validation and verification bodies,” in addition to the current ISO 17021 and/or ISO 17065 requirements. It was also noted that the existing accreditation scope under ISO 17021/17065 is not further specified, meaning that ISO 9001 accreditation alone may currently suffice without verified environmental competence (e.g., ISO 14001).

It was therefore proposed to review and establish a requirement that certification bodies verifying EPDs must be accredited in accordance with ISO/IEC 17029. At present, CSC does not define such a requirement. From 2026, this accreditation will be mandatory under the Construction Products Regulation (CPR) for harmonized construction products such as precast concrete components. For non-harmonized products like ready-mixed concrete, CSC should likewise consider introducing this requirement on a contractual basis. Further consultation with the CSC Management Team will follow.

5.4. Annual Audit (“light”)

It was proposed to reintroduce the annual audit, which was previously suspended, potentially in a simplified form with limited scope covering selected projects. The focus should be on time-sensitive criteria, such as M5.01 and M5.02, as well as the chain of custody, without requiring annual audits for every project (Sampling).

5.5. Set limits for the maximum number of documents per criterion.

Some clients frequently upload an excessive number of documents as evidence, which reduces audit efficiency as auditors must spend additional time locating the relevant information. It was therefore proposed to discuss the possibility of setting limits on the maximum number of documents that can be uploaded per criterion. This topic will be addressed at the next CB Roundtable for further discussion with other auditors.

5.6. Further criterion specific feedback

The following additional criterion-specific feedback was provided and will either be discussed during the next CB Roundtable if further input from audits is required, or directly addressed in the CSC Technical Committee meeting if a consensus has already been reached.

1. **E1.03/E1.04 Criteria:** In the current setup, compliance with E1.03 and E1.04 is achieved by publishing a single verified EPD, which operates at the product level but includes plant-specific data (e.g., energy consumption). E1.04 should specify "for a specific plant." Suggested wording for E1.04: "The company has published at least one EPD specific to the plant under certification."
2. **M2.02:** The annex may not be sufficient. During CSC audits, "environmental management systems" were uploaded that were only 1–2 pages long but essentially covered the points outlined in the annex. This should be reviewed.
3. **S4.09:** Consider awarding points if it can be demonstrated that an active works council exists.
4. **E3:** Competencies for GHG (greenhouse gas) audits → enable "GHG audits from a single source." Recognize reports from CSC certification bodies accredited under ISO 17029 to streamline the process.
5. **M:** Integrate ISO 50001 into the CSC system in the category "Management" e.g., criterion M6. (TC discussion for CSC Version 3.1)
6. **E6.06:** Extend the scope of E6.06 to include cement grinding plants as well (TC discussion for CSC Version 3.1).
7. **E7** for aggregate manufacturers: Prioritize waste treatment and recycling; consider developing an alternative version of E7 (TC discussion for CSC Version 3.1).

6. CB compliance with accreditation standard

The four CSC audits conducted in 2025 showed that the audited certification bodies (CBs) in general adhere to the CSC-CB agreement and the criteria outlined in the CSC Technical Manual V3.0. These audits also affirmed the level of certification expertise possessed by the accredited CBs, particularly in concrete production and their chain of custody. The competence of CB auditors is upheld through internal training programs. Any minor non-conformities - those that do not impact the client's CSC certification status - were collaboratively identified and promptly corrected or kept in mind for the client's upcoming recertification.

The CSC CB audits also highlighted several positive aspects, such as the correct denial of insufficient evidence, in some cases the detailed description of validation texts, the proper application of national adaptations, and thorough documentation within the CO₂ modules, among others.

In one of the four CSC CB audits, a higher number of key findings, including several major ones, were identified compared to the average. Therefore, this certification body will be re-audited next year as part of a follow-up review.

Additionally, opportunities for optimization were proposed and deliberated with other CBs, resulting in the successful implementation of some of these suggestions. All the points mentioned were already or will be addressed during the (next) CB Roundtable so that other CBs are also made aware of the problems in order to continuously improve together.

7. Continuation: CB audits in 2026

The CSC will continue performing CB audits in 2026 in various markets. Due to the increasing number of CSC certificates, the number of audits conducted in relevant markets will be increased.

Berlin, 30.12.2025

A handwritten signature in blue ink, reading "Andreas Tuan Phan".

Andreas Tuan Phan