The Global Biodiversity Standard

Certification Appeals Policy

October 2026

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Policy owner	CEO, supported by the Technical Advisory Group and Board
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The Global Biodiversity Standard (TGBS Ltd)

Certification Appeals Policy

TGBS Ltd company policy

Applicants, certificate holders and materially affected stakeholders may challenge a TGBS certification decision through an impartial peer-review process. Conflicted hubs, assessors and decision-makers take no part.

1. Purpose and scope

This policy applies to formal requests to reconsider a TGBS site certification, pre-certification or Certified Plan decision or a TGBS assessor or trainer certification, including grant, refusal, level, condition, suspension, withdrawal, scope or material procedural decision. It does not replace the Complaints Policy for service or conduct issues, though one submission may be routed under both policies where necessary.

An appeal may be made by the applicant or certificate holder and by an Indigenous People, local community, landholder, rights-holder or other stakeholder that can show it is materially affected by the decision. TGBS will provide reasonable assistance and accessible submission routes without advising on the merits.

2. Grounds and time limits

An appeal must normally be received within 30 calendar days after the appellant was notified of the decision or, for a materially affected third party, within 30 calendar days after they knew or could reasonably have known of it. The Appeals Chair may extend time where access, language, disability, community process, late disclosure or another fair reason justifies it.

- material procedural error or failure to follow the applicable standard or methodology;
- material factual error, overlooked evidence or significant new evidence that was not reasonably available earlier;
- incorrect or inconsistent application of criteria, scoring, conditions or decision rules;
- actual, potential or perceived conflict of interest, bias or lack of independence;
- material failure to consider affected rights, stakeholder evidence, safeguarding, exclusion-list or integrity requirements;
- a decision that is not reasonably supported by the evidence and reasons recorded.

Disagreement alone is not sufficient without a stated ground. The appeal must identify the decision, grounds, supporting information, material effect and remedy sought. Safeguarding, fraud, bribery, corruption or immediate safety concerns will be referred without waiting for the appeal to conclude.

3. Standing Appeals Pool and panel

The Board will appoint a Standing Appeals Pool through terms of reference developed with the Technical Advisory Group. The pool may include trained hub leaders or hub members, technical experts and independent

governance or stakeholder experts. Membership of the pool does not confer authority until a person is appointed to a specific panel.

- A panel will normally comprise three voting members, including an independent Chair and appropriate technical or stakeholder expertise.
- No panel member may have taken part in the assessment, review or decision, belong to or have a material connection with the hub involved, have advised a party on the matter, or have another actual, potential or perceived conflict.
- Panel members must complete a written declaration. The appellant and relevant decision-maker may raise a reasoned conflict concern before substantive review.
- Where the pool cannot provide an independent panel, the Board will appoint external members for that appeal.
- The Secretariat provides administration and the record but does not direct the panel's findings.

4. Roles and responsibilities

- The Board approves the policy, oversees material risks and ensures that allegations involving senior leadership are handled independently.
- The CEO implements the policy, assigns proportionate controls and reports material matters to the Board. A responsibility may be delegated, but accountability remains with the role that delegated it.
- Directors and managers model the required conduct, act on concerns promptly, protect reporters from retaliation and identify conflicts before taking part in a decision.
- All covered persons must understand the policy, complete required training, keep accurate records and raise concerns without delay.
- Each hub must nominate a responsible lead, cascade relevant requirements to assessors and subcontractors, maintain suitable local controls, comply with applicable local law, and report material concerns to TGBS. A hub remains responsible for its own legal duties and personnel.
- Assessors and reviewers must act impartially, declare conflicts, protect evidence and information, and never allow commercial or relationship pressures to affect their professional judgement.
- Hubs and assessors must notify applicants and materially affected stakeholders of the right to appeal, preserve the complete decision record and cooperate with the panel. They must not retaliate or lobby panel members.
- The Technical Advisory Group may advise on general interpretation or hear an exceptional escalation, but conflicted members must recuse and it must not rewrite criteria retrospectively.

5. Submission and admissibility

Appeals should be submitted to info@biodiversitystandard.org marked 'Confidential - Appeal', or through any dedicated appeals channel later published by TGBS. If the appeal concerns the CEO, Chair or a director, the appellant may use any alternative route in the Policy Contact Register.

1. Acknowledge the appeal within five working days and preserve the decision record.
2. A non-conflicted Secretariat lead or Appeals Chair checks standing, scope, timing and stated grounds normally within 10 working days. A defect that can reasonably be corrected should be returned once with a clear deadline.

3. If admissible, appoint the panel and disclose its membership and conflict declarations. If rejected, provide reasons and a route for procedural review by the Appeals Chair or another non-conflicted appointee.

An appeal does not automatically suspend the decision. The Appeals Chair may order an interim hold, restriction or safeguarding measure where implementation could cause irreversible harm, mislead stakeholders or prejudice the appeal.

6. Appeal review and outcome

Once an appeal has been admitted and the panel appointed, the review will proceed as follows:

1. Provide the panel with the decision record, appeal and relevant response. Both sides must see and have a fair opportunity to comment on material relied upon, subject to lawful confidentiality measures.
2. The panel may request clarification, expert advice, a hearing or limited additional evidence. It should not conduct a wholly new assessment unless necessary to remedy the identified ground.
3. Apply the standard, methodology and decision rules in force at the relevant decision date unless a later rule expressly applies or corrects a fundamental fairness issue.
4. Issue a reasoned written decision normally within 60 calendar days after admissibility. Explain any delay and revised date.

The panel may uphold the decision; vary a score, level, condition or scope where it has sufficient basis; remit the matter to a new independent assessor/reviewer; require procedural correction or further evidence; suspend or withdraw the decision; or make recommendations for systemic improvement.

A party may request exceptional review by the Technical Advisory Group or Board within 15 working days only for a material procedural failure, jurisdictional error, unmanaged conflict, irrational outcome or serious new integrity concern. The reviewer will not rehear the merits merely because a party disagrees. The resulting decision is final within TGBS.

7. Misconduct or integrity issues identified on appeal

If an appeal reveals suspected misconduct, conflict of interest, fraud, bribery, safeguarding failure or deliberate evidence manipulation by a hub, assessor, applicant or TGBS representative, the panel will preserve the issue and refer it under the relevant policy. It may continue, pause or adapt the appeal to protect fairness and safety.

- Possible interim or final organisational measures include enhanced quality assurance, mandatory training, supervised work, corrective action, probation, suspension or removal of an assessor, suspension or termination of a hub agreement, referral to authorities, and correction, suspension or withdrawal of a certificate.
- No disciplinary or contractual sanction will be imposed by the appeals panel itself unless governing terms expressly give it that authority. A separate non-conflicted decision-maker must follow a fair process and give the affected person or entity an opportunity to respond.
- Misconduct by a hub or assessor does not automatically invalidate a site's certificate. TGBS will decide separately whether the certificate remains supported by reliable evidence and whether it needs to be corrected, suspended or withdrawn. It will consider the effects of any change on affected communities and ensure that the public record accurately reflects the decision.

8. Reporting and escalation of appeal-related governance concerns

A person may raise a concern orally or in writing and may be accompanied or supported where appropriate. Anonymous reports will be considered as far as the available information allows, but will not be treated as formal appeals. TGBS will assess whether the information can be independently verified, and no adverse finding will be based solely on an uncorroborated anonymous report. Reports should include the facts known, relevant dates, people involved and any evidence that can be preserved safely.

Situation	Route
Ordinary route	Report to the CEO and copy the Board Chair or another non-conflicted director.
Concern involves the CEO	Report to the Board Chair and at least one other non-conflicted director. The CEO must not receive, direct or decide the matter.
Concern involves the Board Chair	Report to the CEO and at least one other non-conflicted director. The Chair must not receive, direct or decide the matter.
Concern involves both the CEO and Chair, several directors, or internal independence is reasonably in doubt	Report to any non-conflicted director or to the Governance Contact, who must notify at least one other non-conflicted director and arrange an independent response. External professional advice or an external investigator must be used where necessary.
Immediate danger or suspected crime/regulatory breach	Contact emergency services, law enforcement or the relevant regulator where appropriate. Internal reporting is not a precondition.

The Board will maintain a current Policy Contact Register containing direct contact details for the CEO, Chair, Governance Contact and at least two other directors. The Governance Contact means the Company Secretary, if appointed, or a non-conflicted director designated by the Board.

No person may investigate, influence, decide or hear a review of a matter in which they are implicated or have an actual, potential or perceived conflict of interest. A report received by an implicated person must be forwarded immediately to a non-conflicted route without screening or alteration.

Retaliation, victimisation, obstruction, concealment, destruction of evidence and knowingly false or malicious allegations are prohibited. A report made honestly will not attract action merely because it is unsubstantiated.

9. Confidentiality, records and non-retaliation

Information will be shared only with those who need it to protect people, assess the matter, comply with law, obtain advice or take action. Absolute confidentiality cannot be promised where disclosure is necessary for a fair process or legal duty.

TGBS will keep the appeal, decision record, conflict declarations, panel materials, outcome, implementation and related integrity referrals in an access-controlled register consistent with certification, contractual and data-protection retention requirements.

Personal data will be handled under the TGBS Data Protection Policy. Records must be factual, access-controlled and kept separately from general personnel or project files where sensitivity requires it.

10. Breaches and corrective action

Failure by a hub, assessor or other covered person to preserve records, cooperate, respect confidentiality, implement a final outcome or avoid retaliation may lead to contractual, disciplinary, accreditation-status or governance action.

11. Monitoring and review

The Secretariat will provide the Board and Technical Advisory Group with anonymised trend information on appeals, timeliness, outcomes, conflicts, recurring interpretation issues and completed improvements. Public summaries may be issued where transparency and confidentiality can both be protected.

12. Related documents

- Applicable TGBS Standard, assessment methodology and decision procedures
- TGBS Complaints Policy; Conflicts of Interest Policy; Code of Conduct; Whistleblowing Policy; Anti-Fraud Policy; Safeguarding Policy; Data Protection Policy.