GREEN MARINE INTERNATIONAL

VERIFIER HANDBOOK

GREEN MARINE AND GREEN MARINE EUROPE ENVIRONMENTAL CERTIFICATION PROGRAMS

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1. General Information

1.1 Introduction

Green Marine International (GMI) is the voluntary environmental certifications' governing body that provides a comprehensive framework for the maritime industry to measurably improve its environmental performance and support the maritime industry's journey towards sustainability. Through its two programs, Green Marine (GM) and Green Marine Europe (GME), GMI works collaboratively with a broad range of maritime stakeholders to address key environmental issues and promote continual improvement beyond regulatory compliance.

GMI's diverse participant membership includes ship owners, ports, terminal and shipyard operators, and Seaway corporations - from small local businesses to multinational enterprises - across North America, Europe, Australia, and beyond. The program is broadly applicable, providing a scalable framework for implementing best and exemplary management practices and for benchmarking progress. Environmental performance is evaluated through a set of performance indicators that target critical issues, including air emissions, water and soil quality, biodiversity protection, as well as social acceptability and community relations.

To obtain program certification, participants are required to submit their first self-evaluation for third-party verification within two years of joining the program. To maintain program certification, participants must complete a self-evaluation annually and get their results verified every two years. Verifications may only be conducted by GMI-accredited third-party professional verifiers who have received training for the GM or GME program certification, depending on their geographic location, to ensure a rigorous and credible certification process that is standardized across the geographies and participant types.

All verifiers receive training to gain a thorough understanding of the programs' requirements, the certification process, the verification requirements, and how to use the online Smart Guide tool, ensuring they are well-equipped to conduct participant verifications in accordance with GMI's standards. Verification-related documents are available in the Members' section[1] of the GMI website.

1.2 Objective of the Handbook

With the growing and diversifying membership and expansion of GMI, clear and comprehensive verification guidelines are necessary to provide a high-quality, standardized framework. This handbook outlines and describes the requirements, expectations, and procedures relevant to GMI-accredited verifiers to guide them in the consistent and thorough application of the programs' verification process.

[1] Member's section: https://green-marine.org /members-section/

1.3 Definitions & Acronyms

Accreditation: The essential credential that is granted to GMI verifiers annually to recognize them as qualified to conduct verifications. It also refers to the process of training, evaluating, and formally recognizing an individual as a qualified verifier.

Certification: Recognition of a participant who has successfully completed the self-evaluation process, has been verified by an accredited verifier, and has been deemed to have met the applicable program's requirements.

Compliance: Regulatory compliance with federal, provincial, state, and municipal environmental laws and regulations.

Conformance: The participants conformance to GM/GME's criteria and program requirements.

Final Results Report: Two-page summary report showing the final levels achieved by a participant for a given year, which is signed by the organization's most senior executive. On verification years, the Final Results Report shows both the claimed and verified results.

Full Self-Evaluation Report: A complete self-evaluation report filled out by the participant showing the answer and justification for each criterion. On verification years, the Full Self-Evaluation Report also includes the verifier's comments.

Green Marine (GM): Refers to the program in North America applicable to all North American participants as well as participants located on other continents, except in European countries.

Green Marine Europe (GME): Refers to the program encompassing all participants based in Europe, as well as those located in European overseas territories.

Green Marine International (GMI): Entity incorporated in May 2024 to reflect the environmental certification program's increasing global reach. This governing body unites Green Marine and Green Marine Europe environmental certification programs under a single organization.

Justification: Quantitative or qualitative information, records or statements of fact pertaining to the existence and implementation of an action, which is based on observation, measurement, or test, and which can be verified.

On-Site Verification: A verification process requirement where a GM/GME-accredited verifier meets in person with a participant at their head office. For landside participants, this step includes a tour of the property and all the facilities and infrastructure relevant to the GM/GME program certification. For ship owners, it is also recommended to include a vessel/ship visit; however, this is not mandatory.

Participant: Ship owner, Terminal operator, Shipyard operator, Port, or Seaway corporation.

Quality Assurance: Refers to the proactive and systematic activities designed to ensure that the verification requirements are consistently applied and aligned with GMI's standards. It focuses on preventing issues by maintaining the credibility, transparency, and reliability of the certification.

Quality Control: Refers to the monitoring and evaluation activities of completed verifications to ensure they have been conducted in accordance with GMI requirements and standards. It focuses on detecting and correcting issues through direct observation and review.

Self-evaluation: Annual internal benchmarking of the environmental performance by participants done using the Smart Guide (*see the Smart Guide definition below).*

Smart Guide (SG): Online tool used by GMI participants and accredited verifiers to complete the annual self-evaluation and verification, respectively.

Verification: Consists of assessing the accuracy, relevance, and adequacy of the participant's self-evaluation, including a documentation review, in-person meeting, and a site visit for levels reported to the GMI.

Verifier: An experienced, competent, and trained third-party who has received accreditation from GMI to conduct external verification of participants of either the GM or GME program.

Verifier Module: Sections of the Smart Guide completed by the verifier after being granted access to the participant's self-evaluation. These sections include general information about the verifier's mandate, their assessment of the verification process with the participant, comments for each of the criteria marked as YES or N/A by the participant, as well as verified results and justification for level changes, if applicable.

2. Verifier Accreditation

This section provides an overview of the accreditation process for verifiers under the GM/GME programs. It outlines the responsibilities of GMI, the recruitment and selection process, and the steps required for candidates to obtain and maintain accreditation. The diagram at the end of Section 2 (Figure 1) illustrates the full accreditation cycle, from initial application to annual renewal.

2.2 Role of GMI

It is the responsibility of GMI to maintain an adequate roster of accredited verifiers. This roster should reflect both the geographic distribution of participants and, to the extent possible, their linguistic requirements, with a higher concentration of verifiers in areas where participant density is greatest.

As the participant membership continues to grow across new regions and continents around the globe, GMI periodically recruits new verifiers to ensure sufficient geographic coverage. This approach helps to maintain accessibility and keep verification costs reasonable for all participants.

2.3 Recruitment Process

GMI periodically issues a call for verifier candidates through its website and various communications channels (e.g., newsletter). Targeted recruitment efforts may also be launched to address specific needs, such as:

- Growth in participant membership within specific regions;
- Expansion of the program into new geographic areas;
- Replacement of departing verifiers.

In addition, unsolicited applications can be submitted to info@green-marine.org and info@greenmarineeurope.org. These are retained in a pool of potential candidates and reviewed during future recruitment cycles as needed.

2.4 Application Requirements

Candidates are required to complete the online application form and provide any other relevant documents, as needed, by the specified deadline in the call for candidates. All applications will be reviewed by GMI to determine alignment with established prerequisites.

2.5 Verifier Selection

To maintain credibility and ensure an objective and transparent selection process, candidates are evaluated based on specific criteria. To be considered, candidates must meet ALL of the minimum qualifications, competencies, and experience in Table 1 below. Only those candidates who meet the criteria and are located in the region(s) targeted for recruitment will be contacted to proceed with accreditation.

Table 1. List of Prerequisites for Verifier Candidates

Qualifications*
• Certified auditor in compliance, International Safety Management (ISM), and/or Environmental Management Systems (EMS), such as ISO 14001
Competencies
• Demonstrated proficiency in applying auditing principles, procedures, and techniques in a manner that ensures consistency, professionalism, and systematic execution throughout the auditing process
• Demonstrated proficiency in verifying the accuracy, relevance, and adequacy of justifications provided by auditees
Experience*
• Minimum of five (5) years of experience conducting compliance, EMS, or ISM audits
• Minimum of three (3) external audits conducted within the past five (5) years.
• Minimum of one (1) year of experience with the marine transportation industry

** Note: GMI may consider alternative certifications and experience if they prove relevant to the program, along with demonstrated auditing experience.*

Through their qualifications and experience, verifiers should possess a certain level of subject matter expertise directly related to the key issues covered by the GMI programs, as well as experience with the marine transportation industry, for example, in:

- Navigation;
- Marine and port/terminal/shipyard maintenance and operations (e.g., sustainable shipping and best management practices);
- Ship design;
- Ocean engineering;
- Emission and waste reduction technologies and strategies, as well as pollution prevention and control measures in the maritime sector;
- Marine environmental management and planning;
- Environmental and social impact assessments related to maritime operations;
- Familiarity with relevant international, national, and regional environmental standards, regulations, and compliance applicable to the maritime sector;
- Inspection, consulting, and/or training experience.

2.6 Verifier Candidates

2.6.1 Initial Training

To obtain the GMI verifier accreditation, eligible candidates meeting the minimum experience requirements must first participate in a virtual training session and then pass a two-part written competency exam to ensure their understanding of the programs' principles, requirements, and verification process and standards, as well as their verification skills. Successful completion of the exam demonstrates that a candidate has the knowledge and skills to conduct verifications in a consistent, professional, and systematic manner in accordance with the GMI standards. This training is planned only when GMI needs to expand its verifier pool and typically occurs in the fall.

2.6.2 Code of Conduct

As part of the accreditation process, candidates are required to sign the GMI Verifier Code of Conduct (see Annex 1). Adherence to this Code is a condition of accreditation, and candidates are expected to uphold its principles throughout their role as verifiers.

The Code addresses such topics as:

- Ethics (independence, impartiality, transparency, honesty, public trust and reputation, and professional competence);
- Conflicts of interest; confidentiality; and data protection;
- Anti-spamming; gifts and benefits; anti-bribery and corruption;
- Inclusivity and fairness; timeliness and readiness; and whistleblower protection; and
- Breaches and consequences for violations.

The Code of Conduct must be resigned every 3 years or every time it is updated.

2.7 Newly Trained Candidates & Previously Accredited Verifiers

2.7.1 Annual Verifier Training

Newly trained candidates who successfully complete the above, as well as previously accredited verifiers, are required to attend a mandatory training session held at the beginning of each calendar year, typically in late January or early February. This session serves to refresh verifiers on the verification and certification processes, but mostly, it provides a review and comparison of program updates for the previous two years. Refer to section 4 for more information. Much of the content is the same as provided to participants at their annual kick-off information session, typically scheduled in early to mid-January. In this way, the same expectations are set for the verifiers and their clients, the participants.

2.7.2 Accreditation Letter

Following successful completion of the annual training, GMI issues an official accreditation letter to each verifier via email. This letter is valid only for the calendar year in which it is issued and must be obtained prior to conducting any verifications for the year in question. Verifiers should include this letter when submitting quotes or proposals to participants.

2.7.3 Annual Verifier Debrief

Verifiers must also participate in the annual verifier debriefing session, typically held during the summer or early fall, after the verification deadline and completion of quality control spot-checks. This session provides an opportunity for feedback to be exchanged between verifiers and GM/GME Program Managers and supports improvement of the verification process. Refer to section 4 for more information.

2.8 Verifier Accreditation Fees

To obtain and maintain accreditation, verifiers are required to pay the applicable accreditation fees:

- Initial Accreditation Fee: Payable prior to participating in the initial training session;
- Annual Renewal Fee: Payable following completion of the annual verifier training, to maintain their accreditation.

For questions regarding current verifier accreditation fees, please contact GMI at info@green-marine.org or info@greenmarineeurope.org.

2.9 Verifier Accreditation Withdrawal or Suspension

All decisions regarding verifier recruitment, training, and accreditation are made at the discretion of GMI.

GMI reserves the right to withdraw or suspend the accreditation of a verifier if they have misleadingly used the accreditation or have engaged in conduct that could compromise the integrity or reputation of GMI, its programs, or its members.

Examples of circumstances where the accreditation may be withdrawn or suspended include, but are not limited to:

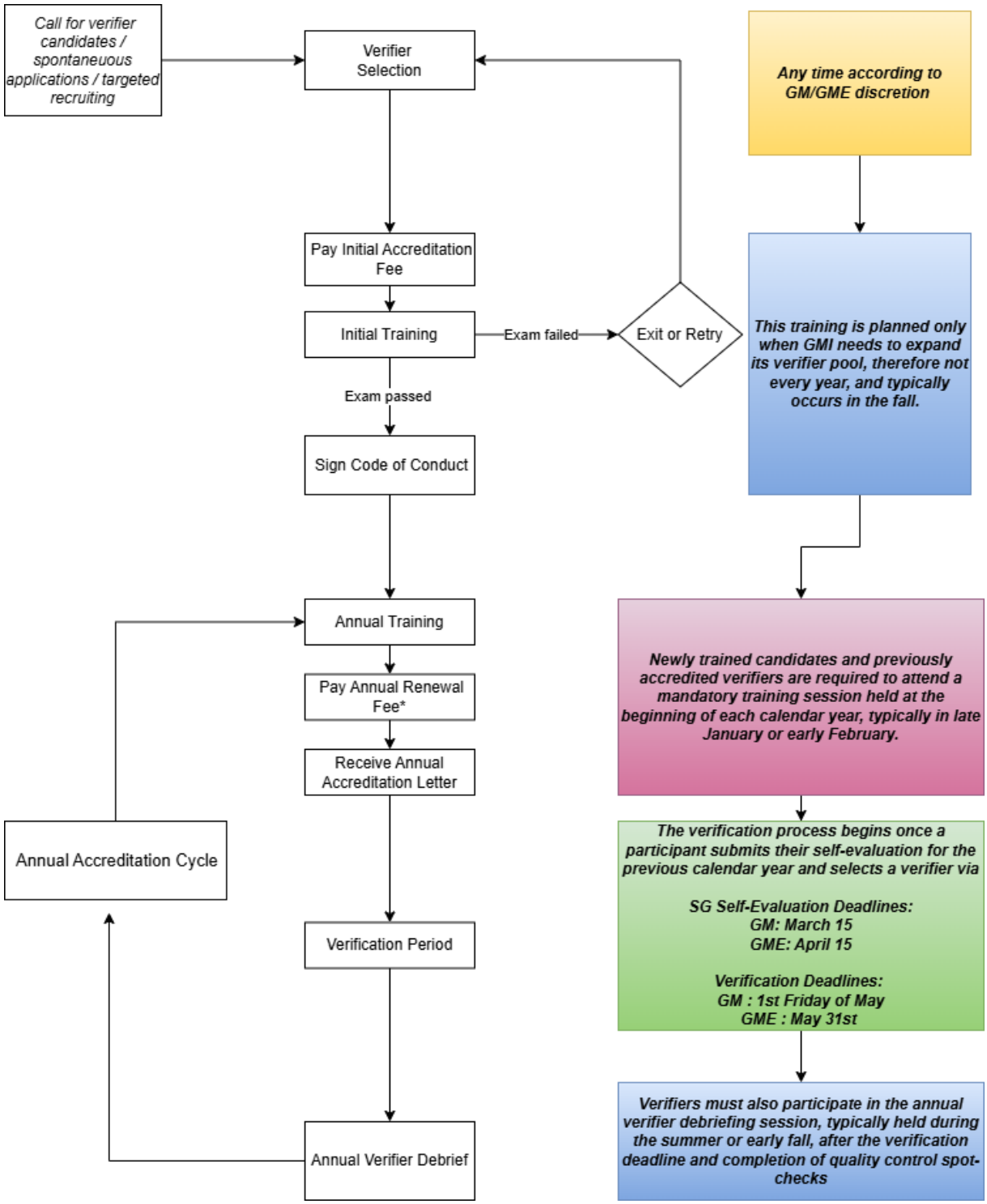
- The verification was improperly conducted, or the results were inaccurately or inadequately reported;
- Willful misconduct, gross negligence, or significant omissions are identified;
- Deliberate misrepresentation by the verifier or their organization;
- Deficiencies are identified during the verification process and appropriate corrective actions are not taken;
- Breach of the Code of Conduct.

2.10 Verifier Roster

The list of accredited verifiers is maintained publicly on GMI's websites[2]. Verifiers' organization, location, languages spoken, biography, phone number, email address, and LinkedIn link are made available online so that they may be contacted. Verifiers shall inform GMI of any updates to this information to keep their listing current.

[2] https://green-marine.org/certification/verifiers/ ; https://greenmarineeurope.org/en/certification/verifiers/

Figure 1. Diagram of the Verifier Accreditation Steps



** This applies only to returning verifiers getting reaccredited and not to new verifiers getting accredited for the first time and who paid the initial accreditation fee.*

3. Verification Process

3.1 Purpose and Scope

The GMI-accredited verifiers' mandate is to validate the participant's fulfillment of each criterion and levels achieved as reported in their annual self-evaluation via the Smart Guide. It is the verifier's responsibility to:

- Assess the accuracy, relevance, and adequacy of the participant's justifications in accordance with the methodology outlined in the verifier training;
- Confirm whether the participant has used appropriate methodologies and tools, where applicable, such as those proposed in the programs' annexes and/or other documents, to satisfy the program's requirements;
- Document the verification in alignment with GMI standards. This includes ensuring all required information relevant to the verification has been provided, such as:
    - Verification details;
    - Verifier observations, notes, and comments;
    - Verifier's agreement or disagreement with participant justifications;
    - Confirmation of verified levels.

Verifiers are not responsible for verifying compliance with applicable environmental laws and regulations; however, participants must be able to demonstrate to the verifier that:

- A designated individual is responsible and adequately resourced to monitor, interpret, and apply the relevant regulations; and
- Concrete actions are taken to regularly monitor regulatory changes, ensuring a reasonable level of knowledge and awareness of, and compliance with, its legal and regulatory obligations;
- They have taken or will take appropriate and timely corrective action(s) to diligently address major non-compliances, if applicable, as per the Certification Policy (see Section 6 on Major Non-Compliance Process and Annex 6 for more details).

3.2 Verifier Contracts

GMI follows an open-market approach, allowing accredited verifiers to set their own competitive rates for conducting verifications. Participants are encouraged to solicit multiple bids from GMI-accredited verifiers for each verification. As a result, verifiers may receive several bid requests annually, noting that it is the participant's responsibility to initiate and manage this bidding process. It is recommended that participants and verifiers sign a contract by March 15th (for GM) and April 15th (for GME).

GMI recommends that all bids be as detailed and transparent as possible. Bids should include, for example:

- A clear breakdown of services;
- Estimated hours for in-person and virtual meetings;
- Time required to complete the Smart Guide verifier module;
- Travel and accommodation expenses;
- Any other relevant costs.

This level of detail helps to ensure alignment and agreement between all parties. Any contract signed between a participant and a verifier constitutes a private agreement between these two parties, establishing the scope of work, the schedule for completing the verification, and associated fees. Prior to contracting, both parties must also determine whether a potential conflict of interest (see Annex 1 – Code of Conduct) exists that would render the verifier ineligible to complete the verification.

To help reduce travel costs, participants within a region may coordinate and jointly engage a verifier for multiple verifications during a single trip.

On occasion, verifications may require additional time for follow-up or to provide and review additional information. These potential costs should be discussed with the participant in advance to ensure a clear understanding of and agreement on those terms if they are encountered.

Participants are solely responsible for the timely payment of all agreed-upon fees and expenses, as outlined in the accepted bid and the terms of any associated contracts/agreements. In the event of significant payment delays, verifiers are encouraged to notify GMI.

3.2.1 Verifier Limitations

To ensure that participants certified under the GMI programs benefit from a world-class certification process with the highest governance standards, thus protecting the value of the certification, the following rules are effective as of January 1, 2026:

- Rotation requirement: A participant may not use the same verifier for more than three consecutive verifications. This rule applies retroactively to January 1, 2022. As verifications occur every two years, the first impact of this rule will be in 2028. The participant may select a previous verifier after a minimum of one verification has been completed by a different verifier.
- Verifier workload limits: To ensure consistent quality and rigour within the short annual verification window, each verifier is limited to a maximum of 20 verifications per year.

Exceptions may be granted on a case-by-case basis where justified. These limitations reflect best practices used by leading certification programs to minimize the risk of complacency and are intended to maintain a rigorous, transparent, and credible verification process.

3.3 Verification Deadline

The verification process begins once a participant submits their self-evaluation for the previous calendar year via the Smart Guide, with the following deadlines in place to support the timely publication of GM and GME Annual Performance Reports:

Deadlines	Green Marine	Green Marine Europe
Self-Evaluation	March 15	April 15
Verification	1st Friday of May	May 31

Extensions to the verification deadline may be granted to participants by GMI under extenuating circumstances.

Once a verifier is contracted, the verification process must follow the steps outlined below. These steps are also detailed in the Verification Guide, which is updated as needed and shared with all participants at the beginning of each year The Verification Guide is also available in the Member's section.

3.4 Conducting the Verification

After completing and submitting their self-evaluation(s) via the Smart Guide and once a contract has been signed with a verifier, participants must select their verifier from the list of accredited verifiers within the Smart Guide. Once selected, the verifier is automatically granted access to the participant's completed self-evaluation(s). Verifiers must log in to the Smart Guide to access the participant's self-evaluation and complete the Verifier Module, the official record of the verification process that must be finalized before the deadline.

3.4.1 Level 1 Verification

Regulatory compliance is the responsibility of the participant. Verifiers do not verify compliance with applicable laws. The verifiers' mandate is to verify the criteria and levels achieved within the Green Marine program. However, participants must be able to demonstrate to the verifier that:

- There is at least one designated individual responsible and adequately resourced for the monitoring, interpretation, and application of regulations;
- Concrete actions are taken to monitor changes in regulations regularly to ensure a reasonable level of knowledge and awareness by the participant of their legal and regulatory obligations.
- They have taken or will take appropriate and timely corrective action(s) to diligently address major non-compliances, if applicable, as per the Certification Policy (see Section 6 on Major Non-Compliance Process and Annex 6 for more details).

Examples of acceptable documentation to demonstrate conformance with level 1:

- Regulatory monitoring software;
- Notifications or consultation with governments, class societies, or associations;
- Environmental compliance audits;

- Applications for or renewal of certifications and permits;
- Subscription to specialized magazines, newsletters, or monitoring systems;
- Participation in committees, conferences, training courses, or workshops with a focus on the industry's regulatory obligations;
- Purchased regulatory compendiums or references on the company's regulatory obligations;
- Artificial Intelligence (AI) (with Generative AI platform) powered environmental regulatory software that keeps track of statutory and regulatory requirements and provides reports back through "agentic" or "non-agentic".

Note: This list is not comprehensive. Any further approach taken by the participant that demonstrates conformance with level 1 may supplement this list.

3.4.2 Documentation Review

A hybrid approach to verifications is encouraged, where the majority of the verifier's desktop documentation review is completed prior to the in-person meeting. This approach improves the overall efficiency and effectiveness of the in-person meeting.

Verifiers must review the participant's justifications and supporting documentation uploaded in the Smart Guide to verify that the criteria claimed as fulfilled or non-applicable are met, in order to achieve the reported levels. Supporting documents may be shared with the verifier through an alternative digital file-sharing software (e.g., Dropbox, SharePoint) if agreed upon by both parties.

The verifier must conduct a criterion-by-criterion check for:

- All levels for a new participant's first verification;
- All levels for the verifier's first verification of the participant, or if a verifier has not verified the participant in the last five years;
- New levels claimed since the last verification;
- New and revised criteria since the last verification; and
- Highest level achieved in each performance indicator.

Beyond the above requirements, verifiers are also encouraged to apply a risk-based approach to spot-check documentation at their discretion, with a focus on validating methodologies and calculations for inventories and ensuring that all requirements in applicable annexes are met.

If necessary, verifiers may request additional information or clarification from the participant before the in-person meeting.

3.4.3 In-Person Meeting

For all participants, a mandatory in-person meeting must be held during each verification between the participant and the verifier to review the self-evaluation results, discuss the verifier's findings, and address any questions the verifier may have on the criteria interpretation and implementation. During this meeting, the participant will be asked to provide an overview of its activities, operations, and facilities, as well as describe staff responsibilities and authority for environmental management, and other related environmental management system certifications. The participant

may ask questions or raise concerns at any time, and verifiers may request to interview other relevant managers and staff within the participant's organization to ensure their understanding of the justification submitted and validate the proper implementation of the criteria.

While the verifier is on-site for the in-person meeting, all Landside participants (Ports, Terminals, Shipyards, and Seaway Corporations) must also take their verifier on a site tour to provide an overview of the participant's activities and operations and corroborate any justification provided. While ship owners are not required to offer vessel visits, it is strongly encouraged whenever possible.

Based on the verifier's assessment, reported levels may be upgraded (e.g., if the participant underestimated the levels achieved) or downgraded (e.g., due to insufficient justification or misinterpretation of criteria). The in-person meeting should conclude with both parties agreeing on and confirming the final levels to be reported, unless the verifier grants additional time for the participant to submit further justification.

The on-site component of the verification (in-person meeting) is expected to last between a half-day and two days, depending on the participant's degree of preparation, the quality of justification documents, the levels claimed, and the area(s) of the site to be toured (for all landside participants) or if a ship visit is planned (optional, but recommended). From experience, in-person meetings for the verification of levels averaging between 1 and 2 take approximately a half-day to complete, including a site visit. Verification of higher levels (3 to 5) generally takes between one and two days. In all cases, in-person meetings are not expected to exceed two days on-site.

3.4.4 Finalizing the Verification

Verifiers may accept, at their discretion, additional justification documentation after the in-person meeting, provided the verification is completed and signed, and verified results are submitted by the verification deadline. If deemed necessary by the verifier, this additional documentation may be uploaded to the Smart Guide by the verifier.

If the participant requests to provide documentation after the verification deadline has passed, GMI must be contacted to determine whether a short extension may be granted.

All verifier comments entered in the Smart Guide must be reviewed with the participant. Any outstanding issues or questions should be resolved before submitting the final results. Verifiers must submit the final verified results via the Smart Guide verifier module at least a few days prior to the verification deadline. This provides time for participants to review the final results report, obtain the required signature from senior management, and upload and submit the signed report in the Smart Guide prior to the deadline.

Verifiers must ensure that all relevant information is clearly documented in the Smart Guide, including the rationale for any level changes. A Smart Guide tutorial is available in the Members' section.

3.5 Multi-Site Verification Policy

The Multi-Site Verification Policy (see Annex 2) outlines the process and requirements for participants reporting multiple sites in aggregate. This Policy aims to ensure that the verification of multi-site participants is both practical and economically feasible, providing adequate confidence in the certification rigour across all grouped sites. This policy primarily applies to terminal operators (excluding ferry terminals) and certain ports reporting grouped results. It may also apply to some shipyards on a case-by-base basis, to be agreed upon with Green Marine Program Managers. .

The main points detailed in the Policy refer to the following elements:

- Reporting grouped results for multiple sites: participants must complete individual self-evaluations within the Smart Guide for each location within the group. The Smart Guide automatically determines the lowest common level across each performance indicator and exports this to a single final results report.
- Site Visits: Participants must determine the number of site visits per verification year based on the total number of locations within the group. Participants must also provide GM/GME with a Verification Site Visit Schedule identifying which locations are to be visited over the subsequent verifications every other year, until all locations have been visited. Any modification in the groupings of sites should be reflected in the Schedule and communicated to GM/GME;
- Documentation Review: The policy sets out guidelines for verifiers reviewing the documentation of ALL the location(s) in the sub-group to be visited every other year and allows for risk-based sampling methods. Verifiers must document their methodology in the verification module of the Smart Guide.

4. Quality Assurance & Quality Control

Quality assurance (QA) & quality control (QC) are essential components of the verification process, developed and undertaken to ensure that the verification process is consistent, robust, and maintains the highest degree of rigour via requirements for both the process as well as the verifiers executing that process.

The following external verification quality assurance (annual verifier training and debrief sessions) and quality control (verification shadows and spot-checks) procedures are in place at GMI. In addition, GMI may follow up with verifiers who did not conduct any verifications during the year to understand the reasons (e.g., inability to secure contracts, workload constraints, leave, company changes, or retirement). This helps GMI assess verifier engagement and identify potential gaps.

4.1 Annual Verifier Training

At the start of each calendar year, all previously accredited verifiers, as well as those undergoing accreditation, are required to participate in a mandatory virtual training session organized by GMI to renew/obtain their accreditation. The purpose of this session is to ensure alignment with current program standards and expectations.

The training agenda items typically include, but are not limited to:

- Review of the program certification processes, including the self-evaluation and the verification;
- Review of program updates for the last two years (new and/or updated performance indicators and criteria);
- Clarification of criteria interpretation;
- Review of relevant verification guidance documents, such as the GMI Verifier Handbook, Verifier Code of Conduct, Verification Guide, Multi-site Verification Policy, and Dispute Resolution Process.
- Any other pertinent updates or information.

4.2 Annual Verifier Debriefing

Each year, following the end of the verification period, GM and GME organize a meeting to discuss issues, comments and/or questions raised during the verification process. Analysis of verification statistics, such as level changes per performance indicator and per verification, is shared. This mandatory meeting also provides an opportunity for verifiers to share observations from their individual experiences and feedback for continual improvement.

4.3 Verification Shadows

As circumstances allow, each GMI Program Manager attends at least one verification a year as an observer, which includes observing virtual pre-site visit meeting(s) as well as the in-person/site visit meeting with the participant. The role of the Program Manager is strictly observational, though they may be asked questions and considered an available resource.

To facilitate the scheduling of verification shadows, verifiers and participants are encouraged to notify GMI as contracts are received/confirmed. GMI aims to rotate shadows among verifiers based on several factors, including but not limited to:

- The last time verifiers were shadowed;
- The type of participants (new participant, new sub-entity, etc.);
- The location of participants.

Once a verification shadow has been confirmed, the verifier must inform the relevant Program Manager of any planned virtual pre-site visit meetings, as well as the date of the on-site verification, once it has been scheduled. As a component of the verification shadow, Program Managers must be invited to attend all key virtual meetings prior to the on-site visit. While not mandatory, they may also be invited to participate in other ancillary clarification or follow-up calls/meetings.

Following completion of the verification shadow, the Program Manager will complete a Verifier Shadow Report Form (see Annex 3) to identify any relevant comments or observations, including recommendations and potential areas for improvement, where applicable. This report will be shared with the verifier for review and feedback.

4.4 Verification Spot-Checks

To help ensure the quality of the verifications being conducted, GMI conducts annual spot-checks of completed verifier modules within the Smart Guide.

A minimum number of verifier modules are reviewed each year from the Smart Guide. This number is determined based on the number of accredited verifiers for a specific program for that verification year, with at least 25% of verifiers in each program being subject to an annual spot-check (e.g., 27 verifiers = 7 spot-checks).

Spot-checks are selected as follows:

- 3 verifier modules are spot-checked (equivalent to ≤ 40% of spot-checks) from verifiers who completed the most verifications (each of these verifiers will have one of their verifier modules reviewed);
- 4 additional verifier modules are spot-checked (equivalent to ≤ 60% of spot-checks) from verifiers who conducted at least one verification, ensuring a fair rotation so that all verifiers are eventually spot-checked;
- Additional spot-checks are conducted under specific conditions and count towards the overall spot-check requirements, including:
    - First-time GM/GME verifiers;
    - Verifiers with prior spot-check issues;
    - Representation across all sectors (ship owners, ports, terminal and shipyard operators, and seaway corporation);
    - A balanced sample of participants and performance levels (achieved and verified).

Once the verification deadline has passed, verifiers selected for a spot-check, along with the relevant participant, are notified by email that their module was selected. If there is no particular issue raised by the participant, the verifier and/or participant are then asked to share the PDF of the verified self-evaluation with all the verifier comments, entered via the verifier module, for review by GMI. The spot-check consists of a criterion-by-criterion review to determine alignment of the verifier's review and justifications with GMI expectations and requirements.

Completion of the spot-check is documented on a Spot-Check Report Form (see Annex 4) and is used to provide feedback, such as suggestions, recommendations, or items needing improvement, to the individual verifiers under review. In some instances, individual verifier follow-ups may be conducted when:

- A verification has a significant number of level changes, either up or down;
- Comments and/or justifications provided by verifiers appear to be insufficient;
- Or for any other reason, if/as deemed necessary by GMI.

General findings and anonymized feedback from the spot-check quality control procedure are shared with all verifiers at the annual debrief session.

It is incumbent on Verifiers to answer or address any questions or concerns GMI raises about the verification process to GMI's satisfaction.

5. Dispute Resolution Process

The Dispute Resolution Process (see Annex 5) outlines how GMI addresses disagreements or disputes that pertain to the administration, interpretation, or application of the programs. The process provides formal guidelines for receiving, reviewing, and determining an appropriate and binding resolution for any disagreement. The process also aims to improve transparency, accountability, and fairness in addressing disagreements that may arise between participants, verifiers, and/or GMI.

Should a disagreement arise, participants or verifiers should contact GMI for guidance on interpretation and attempt to resolve the issue informally. If the disagreement remains unresolved, a subcommittee of GMI's Board of Directors will be assigned to review the case formally.