

**MARYLAND DEPARTMENT OF THE ENVIRONMENT**

Air and Radiation Management Administration • Climate Change Division  
1800 Washington Blvd. • Suite 730 • Baltimore Maryland 21230  
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**Maryland CO<sub>2</sub> Budget Trading Program**

**Accredited Offset Verifier Pre-Engagement  
Disclosure Submittal**

**Version 1.0**

## 1. Overview

Prior to engaging in verification services for an offset Project Sponsor, an accredited verifier must disclose all relevant information to the Maryland Department of the Environment through a *Pre-Engagement Disclosure Submittal* to allow the Maryland Department of the Environment to evaluate whether a potential conflict of interest exists, with respect to the offset project, between the accredited verifier and the offset project developer, offset Project Sponsor or project sponsor organization, or any other party with a direct or indirect financial interest in the offset project.

The accredited verifier must disclose in this submission information related to all facts or circumstances that have the potential to create a conflict of interest with respect to the offset project, offset project developer, offset Project Sponsor or project sponsor organization, or any other party with a direct or indirect financial interest in the offset project. In addition to the disclosure provided through this submittal, accredited verifiers have an ongoing obligation to disclose to the Maryland Department of the Environment any facts or circumstances that may give rise to a conflict of interest with respect to the offset project, offset project developer, offset Project Sponsor or project sponsor organization, or any other party with a direct or indirect financial interest in the offset project.

The Maryland Department of the Environment may reject a verification report and certification statement that is submitted as part of an offset project *Consistency Application* or *Monitoring and Verification Report* if it determines that the accredited verifier has a conflict of interest related to the offset project, offset project developer, offset Project Sponsor or project sponsor organization, or any other party with a direct or indirect financial interest in the offset project.

Failure to disclose any facts or circumstances that may pose a potential conflict of interest may result in revocation by the Maryland Department of the Environment of the verifier's accreditation.

## 2. Submission Instructions

Submit this *Pre-Engagement Disclosure Submittal* to the Maryland Department of the Environment if the offset project is located in Maryland. If the offset project is not located in Maryland, a similar submittal should be provided to the applicable regulatory agency in the state where the offset project is located, in accordance with the applicable regulations in that state.

Submit one (1) complete hardcopy original of the *Pre-Engagement Disclosure Submittal* and one (1) electronic copy on a CD or DVD disk to the Maryland Department of the Environment at the location specified below. Submit hard copies of forms requiring signatures as originally-signed copies and scan such signed forms for electronic submission. Facsimiles of the *Pre-Engagement Disclosure Submittal* are not acceptable under any circumstances.

Maryland Department of the Environment  
Air Quality Planning Program, Offsets  
1800 Washington Boulevard  
Baltimore, MD 21230

The *Pre-Engagement Disclosure Submittal* has been created as a Microsoft Word document with editable fields. Enter information directly in the fields provided in the forms or submit attachments with the information or documentation requested, as instructed. Include headers on all attachments indicating the form to which each is attached.



The applicant should save an electronic copy of the *Pre-Engagement Disclosure Submittal* for its file.

### **3. Submittal Forms**

The *Pre-Engagement Disclosure Submittal* includes five (5) forms:

- Form 1 - Contact Information
- Form 2 - Description of Engagement
- Form 3 - Disclosure of Potential Conflict of Interest
- Form 4 - Conflict of Interest Mitigation Measures
- Form 5 - Attestations



## Form 1: Contact Information

Name of Accredited Verifier (Organization):

Point-of-Contact:

Mail Address:

Telephone Number:

Fax Number:

E-mail:

Website URL:



## Form 2: Description of Engagement

Describe the engagement in the fields below. Provide a description of the offset project (include the Regional Greenhouse Gas Initiative CO<sub>2</sub> Allowance Tracking System (RGGI COATS) offset project ID code if one exists) and identify the offset project sponsor organization, including Project Sponsor contact information. Describe the type of verification services to be provided (e.g., *Consistency Application* or *Monitoring and Verification Report* and the specific verification services required for the project pursuant to COMAR 26.09.03.08). Identify the Team Leader and Key Personnel that will provide the verification services.

Description of Offset Project and Identification of Offset Project Sponsor Organization:

Type of Services to be Provided:

Proposed Verification Team:



### Form 3: Conflict of Interest Disclosure

In the appropriate fields below, disclose all facts or circumstances that have the potential to create a conflict of interest with respect to the offset project, offset project developer, offset Project Sponsor (including the offset project sponsor organization), or any other party with a direct or indirect financial interest in the offset project.

Ownership of Accredited Verifier Organization:

Past and Current Clients/Contractual Arrangements:

Direct/Indirect Financial Relationship and/or Agreements with the Project Developer/Project Sponsor Organization:

Related Entities:

Personal Relationships:

Any other Facts or Circumstances that have the potential to create a conflict of interest:



## Form 4: Conflict of Interest Mitigation Measures

If the Accredited Verifier disclosed any facts or circumstances in Form 3 that have the potential to create a conflict of interest, describe in the field below measures taken to address such facts and circumstances and mitigate any such potential, including through established organizational protocols for mitigation of conflict of interest potential.



**Form 5: Attestations**

I certify that the undersigned is authorized to make these attestations on behalf of the Accredited Verifier. I am authorized to make this submission on behalf of the Accredited Verifier for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements or information, including the possibility of fine or imprisonment.

\_\_\_\_\_  
Signature of Authorized Representative                      Date

\_\_\_\_\_  
Name in Print

\_\_\_\_\_  
Title

Sworn and subscribed before me on this \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_

\_\_\_\_\_  
Notary Public

