Green Key
Certification Process Manual
2026

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1. INTRODUCTION

With Green Key being a large international programme, it is essential that it has a standard documented process in place that outlines the requirements, procedures, and policies that are followed when certifying establishments, including the procedures regarding re-certifications, certification suspensions and withdrawals, as well as appeals and complaints.

This Manual shall be consistently followed in all Green Key's certification activities, so that the certification process for applicant establishments is carried out in a similar way regardless of their location, size, structure etc. This Green Key Certification Process Manual follows the ISO 17065:2012.

In Green Key, there is a clear separation between the work and responsibilities of the Green Key management (the scheme owner: Green Key International and the National Operators), the auditors used for the audits (the Conformity Assessment Body), and the persons responsible for the certification review and decision (the Certification Body).

All parties involved in the Green Key certification process shall act impartially and independently from external pressures. The requirements for the Green Key management (Green Key International and National Operators) are described in the Green Key Management Manual. The requirements for the engagement of auditors used by Green Key are described in the Green Key Auditor Manual. The requirements for the Certification Body are described in the Certification Body Manual.

This Manual takes effect on 1 October 2026 and replaces all former application, audit/auditor, and certification requirements in Green Key. This Green Key Certification Process Manual is valid in all countries where Green Key is offered.

2. PRE-SCREENING

The pre-screening is part of the pre-certification phase, so an initial task ahead of the official Green Key certification process.

The Green Key National Operator (or Green Key International in countries without a National Operator) is responsible for the desktop pre-screening of establishments who wish to apply for the Green Key certification.

The potential applicant establishment shall provide relevant information in order for the Green Key National Operator (or Green Key International in countries without a National Operator) to review the following:

A. As Green Key makes its certification available to all establishments falling within the defined definition of the Green Key categories, there is a review of whether an

establishment falls within one or more of the categories as defined in the category definitions document.

B. A review of any risks associated with the on-site certification audit of the establishment, including:
    a. the logistics (is it logistically possible for auditing companies used by Green Key to offer audits for the establishment);
    b. auditor health and safety (is the establishment in a country or region that has known health or safety issues);
    c. legal issues (is the establishment on a commercial embargo list or does the country of the location of the establishment prevent the Green Key National Operator or Green Key International in countries without a National Operator from doing business with the establishment).
C. A review of whether the establishment is open and in operation (establishments that are undergoing major constructions/renovation work involving more than 50% of the area of the establishment can only obtain the certificate once they have finalised their works)
D. A review of who is the appropriate contact entity at Green Key to take care of the initial assessment (Green Key National Operator or Green Key International in countries without a National Operator)

The standard pre-screening document is enclosed as Appendix A.

From the information obtained during the pre-screening process, the Green Key National Operator (or Green Key International in countries without a National Operator) will communicate its recommendation and reason for it to the Certification Body and the potential applicant establishment of whether the establishment should proceed with the certification procedures or not.

The Green Key National Operator (or Green Key International in countries without a National Operator) will also communicate to the establishment that it can have Green Key's recommendation checked by the Certification Body.

3. ONBOARDING

The onboarding is also part of the pre-certification phase, so an initial task ahead of the official Green Key certification process.

When the pre-screening confirms that the establishment is eligible for Green Key certification, the Green Key National Operator (or Green Key International in countries without a National Operator) is responsible for the following steps in the onboarding process:

A. PROVIDING INFORMATION TO THE APPLICANT ESTABLISHMENT

The Green Key National Operator (or Green Key International in countries without a National Operator) shall ensure that the applicant establishment has access to all necessary information about the Green Key criteria/explanatory notes requirements, certification process requirements, participation costs and access to other available and relevant information, such as policies, resources and support material.

The Green Key National Operator (or Green Key International in countries without a National Operator) shall also ensure that the applicant establishment has access to the Green Key online application form and certification agreement.

B. OBTAINING INFORMATION FROM THE APPLICANT ESTABLISHMENT

The applicant establishment shall deliver the following general information to the Green Key National Operator (or Green Key International in countries without a National Operator) through the online application form:

a. The establishment's trading name and physical address.
b. The establishment's contact information and invoicing details.
c. The establishment's ownership (name, location, independent ownership/operation, owned by another company, part of a franchise, etc.).
d. Whether the establishment is part of a national/international chain.
e. Details needed to assess the scope of certification, including:
    i. size and scale of the establishment (including number of full-time staff, number of operating locations, gross floor area, number of rooms, visitors, suppliers, etc.);
    ii. the establishment's facilities/services falling within the scope of the Green Key certification.
f. The establishment's history with Green Key in the past four years, including:
    i. whether it has previously been Green Key certified;
    ii. whether it has previously received an audit for Green Key certification but failed to achieve certification;
    iii. whether it has previously had the Green Key certification suspended or withdrawn.
g. The establishment's location and proximity to areas of relevance, including:
    i. location within or close to a natural/culturally sensitive area;
    ii. likelihood of having high influence on the local community.
h. Any other relevant information regarding the establishment's operation, including:
    i. full-year or seasonal operation;
    ii. the complexity and scale of its supply chain (e.g., does the establishment outsource laundry, housekeeping services and/or food/beverage services?).

The completed application form shall contain full information from the applicant establishment related to the conformity of all Green Key requirements.

The applicant establishment shall also deliver the supplementary documents in the format as outlined by Green Key. It is recommended that the applicant establishment uploads all supplementary documents, but the applicant establishment can choose to only upload the minimum supplementary documents.

The standard certification application/audit form with the above-mentioned information is enclosed as Appendix B.

The standard Certification Agreement (enclosed as Appendix C) shall be signed by the responsible signatory of the applicant establishment.

C. COLLECTION OF INFORMATION FROM THE APPLICANT ESTABLISHMENT

The Green Key National Operator (or Green Key International in countries without a National Operator) is in charge of collecting the information from the applicant establishment: completed application form, supplementary documents and signed Certification Agreement. The collection includes a basic check of whether information about conformity with all required criteria and the minimum supplementary documents have been delivered.

From the information obtained during the onboarding process, the Green Key National Operator (or Green Key International in countries without a National Operator) will communicate its recommendation to the applicant establishment of whether the minimum information has been delivered. If Green Key finds that the applicant establishment has not provided all required information, Green Key will request the additional information to be delivered. The Certification Body will also receive the information.

The Green Key National Operator (or Green Key International in countries without a National Operator) will also communicate to the establishment that the establishment can have Green Key's recommendation checked by the Certification Body.

D. PAYMENT OF THE GREEN KEY LEVY

The Green Key National Operator (or Green Key International in countries without a National Operator) shall require payment for the Green Key levy on an annual basis. The payment of the Green Key levy is a pre-condition for obtaining and maintaining the Green Key certification.

The payment before certification shall be done by the applicant establishment when submitting the completed application form, the supplementary documents and the signed Certification Agreement. In connection with the first-time payment, it is possible to charge

part of the payment as a start fee. In certain cases (e.g., due to legislation), it is only possible to charge the establishment after the certification process has been finalised.

The payment during the certification period shall be done no later than 14 months after the certification has been issued.

The payment in connection with re-certification shall be done when the re-applying establishment has submitted the updated application form, the supplementary documents and the signed Certification Agreement. See also Appendix I with the Green Key timeline. In certain cases (e.g., due to legislation), it is only possible to charge the establishment after the certification process has been finalised.

The Green Key levy in each country is determined at the national level. The Green Key levy may be updated once a year, and changes are announced to the participating establishments with at least 90 days' notice. All information about the Green Key levy is publicly available.

The payment of the annual Certification Body fee (including audit costs and the travel costs associated with the audit in years with on-site audits) is a matter between the applicant establishment and the Certification Body.

4. SCOPE OF CERTIFICATION

A. CLARIFICATION OF SCOPE

The Green Key criteria/explanatory notes document specifies the relevant areas of the establishment's operation that are within scope of certification and, therefore, shall be assessed for conformity against relevant Green Key requirements.

All applicable criteria from the Green Key certification standard shall be included in the on-site certification audit (see Chapter 5 of this manual) and the subsequent certification review and decision (see Chapter 6 of this manual).

B. IMPERATIVE AND GUIDELINE CRITERIA

The application form completed by the applicant establishment shall indicate the conformity with all Green Key's imperative criteria marked as "I" in the Green Key criteria/explanatory notes.

The application form completed by the applicant establishment shall also indicate the conformity with Green Key's guideline criteria marked as "G" in the Green Key criteria/explanatory notes. Depending on the year of application or re-application, the applicant establishment shall, in addition to conform with all imperative criteria, also conform with the required percentage of guideline criteria, as shown in the table below. The establishment can choose which of the guideline criteria to implement.

Certification period	Year	Percentage of total imperative criteria	Percentage of total guideline criteria
First	1-2	100%	0%
Second	3-4	100%	10%
Third	5-6	100%	20%
Fourth	7-8	100%	30%
Fifth	9-10	100%	40%
Sixth and thereafter	11-12 and onwards	100%	50%

C. NON-APPLICABLE CRITERIA

If some facilities or conditions required by some imperative or guideline criteria, as defined by the Green Key criteria/explanatory notes document for each category, are not relevant for or present in an applicant establishment, the applicant establishment shall indicate these criteria as "non-applicable (N/A)", so that they are not included in the calculation of the required conformity.

In some exceptional cases, the applicant establishment may not be able to conform with a specific criterion due to external circumstances outside the influence of the establishment. In these cases, the establishment can also indicate this criterion as "non-applicable (N/A)".

The applicant establishment must ensure that the indication of a non-applicable criterion is always accompanied by an explanation in the comment field. Where possible and relevant, the applicant establishment must, additionally, provide documentation confirming the need for a criterion to be treated as non-applicable.

If the number of non-applicable criteria exceeds 30% of the imperative criteria, the establishment is not eligible for the Green Key certification. If any request for a criterion to be non-applicable has a direct negative impact on health and safety at the applicant establishment, the applicant establishment will not be eligible for the Green Key certification.

In order to be valid, the request for criteria to be non-applicable shall be confirmed by the auditor and the Certification Body.

5. EVALUATING CONFORMITY

A. INTRODUCTION TO THE ON-SITE CERTIFICATION AUDITS

In the certification process (first time application or renewal every two years), auditors shall make conformity judgements for each of the applicable criteria in the Green Key certification standard through physical (in-person) on-site certification audits.

Any deviation from this usual audit type and timing used by Green Key shall have a clear rationale and be communicated transparently. Deviations can only occur because of unforeseen circumstances (for example, government-imposed travel restrictions, health or safety concerns that would prevent the use of the usual audit types).

The on-site certification audit involves an auditor carrying out an in-person inspection of the applicant establishment's operations that fall within the scope of the Green Key certification. These include the physical premises of the establishment, any activities carried out by the establishment, the area surrounding the establishment that is directly managed by the establishment and the cooperation with relevant external partners/suppliers.

The auditor shall conduct the on-site certification audit following Green Key's standard audit form, see Appendix B.

The on-site certification audit includes the different auditing methods as outlined in the Green Key criteria/explanatory notes and described in Appendix D.

For first-time and re-certification applicants, the on-site certification audit must take place within six months after submitting the completed application form, the supplementary documents, and the signed Certification Agreement. For re-certification (after one or more periods of certification), the on-site certification audit would normally take place within 4-8 months prior to the expiry date (see also Appendix I with the Green Key timeline).

B. AUDIT DURATION

In connection with the on-site certification audits, it is important that the audit duration is sufficient taking into consideration a) the scale and complexity of the establishment reflected in the number and complexity of applicable criteria, and b) the sustainability risks and any other risks that may require additional time in terms to find evidence of conformity.

The on-site certification audit has a predetermined minimum duration based on the type of establishment. The number of full-time employees in the establishment must as well be taken into consideration. The minimum duration of the on-site certification audit will be determined according to the longest duration of the two components. See table below.

In addition to the minimum duration of the on-site certification audits, the auditor has to factor in sufficient time for appropriate planning and preparing for the audit as well as sufficient time for the audit reporting and follow-up after the actual audit. The minimum total audit duration time includes both the on-site certification audit time as well as the planning, reporting and follow-up time. See table below.

Type of establishment Number of full-time employees	Minimum on-site certification audit time (h) (excl. travel)	Minimum total audit duration time (h)
• Small accommodations (1-20 bedrooms) • Restaurants • Attractions (museums) • Attractions (visitor/interpretation centres) • Max. 5 full-time employees*	2	5
• Conference centres • Attractions (theme parks) • Small-size hotels (21-50 bedrooms) • Small-size hostels (<100 beds) • Small-size campsites (<50 pitches) • Small-size holiday parks (<100 bed places) • 6-25 full-time employees*	3	7
• Medium-size hotels (51-250 bedrooms) • Medium-large-size hostels (100+ beds) • Medium-size campsites (51-150 pitches) • Medium-size holiday parks (101-300 bed places) • 26-100 full-time employees*	4	8
• Large-size hotels (251-450 bedrooms) • Large-size campsites (>150 pitches) • Large-size holiday parks (>300 bed places) • 101-250 full-time employees*	5	9
• Very large-size hotels (>450 bedrooms) • >250 full-time employees*	6	10

** Full-time employees refer to the average number of full-time equivalent employees working in the business over a year, taking into account part-time and seasonal staff required to support the average annual occupancy level.*

The auditor shall in the audit form indicate the start and end time of the audit to verify that the requirement regarding minimum on-site audit duration is followed. In case the audit requires more time than expected, the auditor and the applicant establishment must be ready to handle the situation and use additional time as needed. In case the audit requires less time than expected, the auditor must be able to explain the reasons for this, and that the shorter duration did not affect their ability to make consistent and fair conformity decisions compared to audits of other similar establishments and did not compromise the quality of the audit.

C. AUDITING METHODS

The auditing methods are the practices that auditors shall use assess conformity with each applicable Green Key criterion. The type of verification required for each criterion is

described in the Green Key criteria/explanatory notes document. Further information about the different auditing methods used in Green Key can be found in Appendix D.

It is important that the auditor uses the type of verification mentioned in the requirements for the following reasons:

- To ensure consistency and fairness for the applicant establishments so that all establishments have the same requirements imposed on them in terms of demonstrating conformity with the Green Key criteria.
- To ensure auditing consistency and enable better audit quality control, because all auditors will refer to the same set of auditing methods.
- To pre-determine the competencies that each auditor will need (see the Green Key Auditor Manual).
- To determine which auditors can be used for each audit (see the Green Key Auditor Manual) based on the auditors' demonstration of the required competencies.
- To determine whether the auditors will require any additional equipment, technology, documents, or other materials to carry out audits.

There may be cases where different methods may be necessary for an auditor to make a conformity judgement, and these shall be acceptable if the auditor provides sufficient explanations for these deviations that support the conformity judgements made.

D. AUDITOR ASSIGNMENT

The Certification Body will be in charge of assigning the auditor having the appropriate competences to the applicant establishment. The distance between the location of the auditor and the location of the establishment should be taken into consideration to limit as much as possible the travel footprint of the on-site certification audits. The cost of the auditor must as well be taken into consideration. Finally, the possibility for "pooling" audits (having more on-site certification audits conducted at applicant establishments located in a close distance between each other in one travel) must be supported, where possible, to also take the environmental footprint into consideration.

The assigned auditor will then contact the applicant establishment to determine the date/time for the on-site certification audit.

The assigned auditor can decide to conduct the audit as a single auditor or as an audit team (with an audit team leader and one/more additional auditors). The audit team is especially used when an experienced auditor needs to train a new auditor during the audit, but it can also be used if the audit has a specific scope or complexity requiring additional auditor competences. The audit cost for the applicant establishment will not change irrespective of the audit being conducted by a single auditor or an audit team.

In connection with the assignment of the auditor, the Certification Body shall ensure that the auditor has full access to the audit information package (see Chapter 5E) in order to be able to make a final screening of the material ahead of the on-site certification audit.

When accepting the assignment, the assigned auditor shall confirm to the Certification Body that they do not have any conflicts of interest with the establishment, or any other circumstances that could affect the auditor's ability to act independently and impartially. The auditor cannot have been involved in consultancy for the establishment being audited for a period of two years prior to any Green Key audit.

The assigned auditor shall as well confirm that they have the necessary competences to conduct the on-site certification audit.

The auditor is only permitted to make judgements about an establishment's conformity with the applicable criteria from the Green Key certification standard in connection with the on-site certification audit.

The auditor's involvement after delivering the audit report is limited to the follow-up with the applicant establishment in case of non-conformities.

The assigned auditor must ensure that the applicant/certified establishment does not influence the auditor and the process in any way that could affect the audit results. It is specified in the Certification Agreement (see Chapter 8) and in the Auditor Agreement (see Green Key Auditor Manual) that the establishment is not allowed to influence the auditor by offering any gifts or services to the auditor, except for coffee/tea or water.

Green Key has developed a general policy on impartiality, objectivity, confidentiality, non-discrimination, anti-bribery and anti-corruption (see Appendix E).

If requested by the applicant establishment, the assigned auditor is allowed to conduct a pre-audit ahead of the on-site certification audit. The pre-audit is not part of or replacing the on-site certification audit, but a supplementary audit prior to the on-site certification audit. Any costs associated with a pre-audit is not part of the audit fee charged by the Certification Body for the on-site certification audit. The pre-audit must follow same conditions in relation to impartiality for the auditor and the applicant establishment.

E. AUDITOR INFORMATION PACKAGE

In connection with the auditor assignment, the Certification Body provides the assigned auditor with the audit information package. The applicant establishment must receive a copy of the audit information package.

The audit information package must provide access to include the following:

- The Green Key criteria/explanatory notes document containing information about the requirements and the auditing methods to be used for conformity assessment.
- The completed pre-screening document.
- The completed application form where the applicant establishment has indicated the criteria that are appliable and non-applicable as well as the status of conformity with all imperative criteria and the required percentage with guideline criteria, depending on the year of certification or re-certification.
- All required supplementary documentation delivered with the application form ahead of the on-site certification audit.
- Any documents supporting indications for a criterion to be non-applicable as sent by the applicant establishment.
- Specifications of the locations and operational areas that are within the scope of certification.
- The required minimum on-site and total audit duration time (see Chapter 5B).
- The procedure for the on-site certification audit as described below.
- Information about the language to be used during the audit.
- Information about the deadline for the auditor to organise the on-site certification audit (maximum six months after the establishment submitted the application form and the Certification Agreement).
- Information about the deadline for finalising the audit report (maximum ten working days after conducting the audit).

F. THE ON-SITE CERTIFICATION AUDIT

The objectives of the physical on-site certification audits are to:

- Verify conformity with the Green Key requirements (all imperative and the required percentage of guideline criteria) that are applicable.
- Verify the non-applicability of the criteria indicated as non-applicable,
- Provide suggestions to improve its sustainability performance.

The on-site certification audits shall involve the auditor, the staff member responsible for Green Key at the establishment, at least one representative from the establishment's senior management team and any other individuals the establishment has designated to be involved in the auditing process.

All auditors of the Green Key programme shall adhere to the following schedule for on-site certification audits:

Opening meeting:

- The auditor explains the main objectives of the on-site certification audit.

- The auditor provides a summary of how the on-site certification audit will be done (including the scope of certification, and that conformity is based on a representative sampling and judged by evidence only).
- Clarification of each person's roles and responsibilities.
- Confirmation of matters relating to confidentiality.
- Any health and safety risk mitigation measures that need to be taken (e.g. emergency evacuation procedures, any required personal protective equipment and how this is to be used).

Document verification:

- The auditor will, together with the applicant establishment representatives, go through the application form and material in the Green Key digital folder (prepared by the applicant establishment).
- All imperative and guideline criteria requiring verification of documents are checked, with a confirmation of conformity with all imperative criteria and the necessary percentage of guideline criteria.
- Verification (where relevant) that conformity with certain criteria is non-applicable.
- The assessment that requires the use of the audit methods, document review and document sampling, are included in this part. All other audit methods are not part of the document verification.

The auditor and the applicant establishment can agree that all required documents and material (as prepared by the applicant establishment) are uploaded to the application form, so that the auditor can perform the document verification ahead of the on-site certification audit. The auditor's time for this assessment of the documents/material ahead of the on-site audit will be counted as part of the audit duration time. During the on-site certification audit, the auditor must then briefly inform the establishment about the outcome of the conformity check done ahead of the on-site audit, and the auditor can request additional documents to be checked during the on-site certification audit.

Visual inspection:

- The auditor will, together with the applicant establishment's representatives, conduct a visual inspection of the practical work regarding sustainability in the applicant establishment.
- All imperative criteria and the necessary percentage of guideline criteria requiring visual verification are checked.
- The verification (where relevant) that conformity with certain criteria is non-applicable
- Some visual inspection elements are not based on a full visual inspection but on a representative sampling (see checklist of the visual inspection in the audit forms).

– The assessment that requires the use of the audit methods, on-site sampling, interviews, observation of tasks, visual inspections and testing are included in this part.

Closing meeting:

– After the document verification and visual inspection, the auditor shares the audit result through an oral summary of the findings of the on-site certification audit.
– The auditor makes a conclusion regarding recommendation to expected certification.
– The auditor clarifies that any consultation with external stakeholders is done after the on-site certification audit.
– The auditor explains the next steps (what happens if there is non-conformity with one or more of the required criteria, when the establishment can expect the certification decision, etc.).
– The auditor reminds the establishment that the auditor does not make certification decisions.
– The auditor reminds the establishment that they can appeal the decisions regarding Green Key certification and where they can find Green Key's complaints and appeals policy.

G. AUDIT REPORT

After the on-site certification audit, the auditor shall complete an audit report using the standard format provided by Green Key.

The audit report includes the following:

– The name and location of the establishment.
– The date and time (start and finish) of the audit with comments, if needed.
– The name of the auditor and the auditor company.
– The auditor's conformity judgement for each applicable/relevant criterion in the Green Key certification standard.
– The auditor's confirmation (where relevant) that the establishment's conformity with certain criteria is non-applicable.
– Comments/explanations supporting the auditor's conformity judgement.
– Evidence supporting the auditor's conformity judgement for each criterion (e.g., documents, images, videos, etc.).
– Good practice examples and recommendations.

The auditor's conformity judgements shall be made impartially, consistently, independently and free from external pressures (see Appendix E with Green Key's Policy on impartiality, objectivity, confidentiality, non-discrimination, anti-bribery and anti-corruption).

The audit report shall be prepared electronically following Green Key's format for audit reporting.

For any consultation (additional information/confirmation) from external stakeholders, this will be done in connection with the writing of the audit report.

The deadline for the auditor to prepare the audit report is ten (10) working days after conducting the audit. The audit report must be signed by the auditor.

For evidence submitted with the audit report that contains information about the establishment, Green Key and the auditor/auditing company will ensure that such information is stored securely and kept confidential.

For evidence submitted with the audit report that contains any personal identifying information, Green Key and the auditor/auditing company will ensure that such information is handled following Green Key's data protection policies and procedures (EU's GDPR policy and/or with any other applicable data protection legislation).

The Green Key National Operator (or Green Key International in countries without a National Operator) receives and retains a copy of the audit report as long as the establishment continues its Green Key certification (for the previous five years) and for two years after an establishment is no longer Green Key certified.

H. RECTIFYING NON-CONFORMITIES

The auditor is in charge of sending the completed audit report to the applicant establishment giving the applicant establishment five (5) working days to provide written comments (limited to correction of factual errors, clarification of specific descriptions, etc.). The auditor is in charge of the communication with the applicant establishment regarding the closure of non-conformities.

If the audit report shows full conformity with all applicable and required criteria, the auditor will forward the final audit report to the Certification Body for final review and decision.

If the audit report includes non-conformity with one to five (1-5) applicable and required criteria, the auditor shall inform the applicant establishment about the non-conformities and the need for their rectification. The auditor is not allowed to provide the exact corrective actions for the establishment to rectify. The applicant establishment will have two months to ensure that all required rectifications have been made and evidence of conformity with criteria has been sent. The auditor will, within ten (10) working days after receiving the feedback, evaluate and confirm the evidence. The final audit report is thereafter sent to the Certification Body for final review and decision.

If the audit report includes non-conformity with more than five (5) applicable and required criteria, the auditor shall inform the applicant establishment about the non-conformities and

the need for their rectification. The auditor is not allowed to provide the exact corrective actions for the establishment to rectify. The applicant establishment will have two months to ensure that all required rectifications have been made and evidence of the conformities with criteria has been sent. The auditor will, within ten (10) working days after receiving the feedback, evaluate and ensure that a follow-up on-site audit (at the cost of the applicant establishment) is done. Should the provided evidence not require an additional on-site audit, the auditor can choose to send evaluate and confirm the rectification without organising a follow-up on-site audit.

The closure of non-conformities (with the feedback and evidence shared with by the establishment showing that the non-conformities have been addressed) will need to be updated in the audit report. Within ten (10) working days after the auditor having finalised the audit report, the report is sent to the Certification Body.

6. CERTIFICATION REVIEW AND DECISION

A. INTRODUCTION

Following the audit report with the auditor's conformity judgement (including rectification of non-conformities), the certification review and decision will be the final steps in determining whether an applicant establishment conforms with the applicable and required Green Key criteria and is, therefore, eligible to receive the Green Key certification.

B. CERTIFICATION REVIEW AND DECISION

The certification review is carried out by the Certification Body as the final step before making the decision regarding Green Key certification. The certification review shall include a check of coherence of the auditor's conformity judgements in line with the Green Key requirements. The certification review is made as a desktop review for each criterion that is applicable for the establishment, verifying whether the establishment is conforming with each applicable criterion and if some criteria legitimately do not apply. The certification review must be backed by evidence. In case of doubt regarding a conformity with a criterion, the applicant establishment or the auditor is contacted for clarification and additional information or evidence.

The Certification Body's review must as well confirm that the applicant establishment meets the following requirements:

- The applicant establishment has delivered a completed application form as well as the required supplementary documents.
- The applicant establishment has signed the Certification Agreement.
- The on-site certification audit has been carried out within six (6) months after the applicant establishment has submitted the application form, supplementary documents and the signed Certification Agreement.

- All Green Key criteria, that are within the scope of certification, have been assessed by the auditor and there is verification that the applicant establishment conforms with all of them.
- Any potential outstanding issues after the surveillance activities (from the past certification period) have been resolved, if applicable.
- Any outstanding complaints or appeals have been resolved.
- The certification decision is being done within 12 months after the applicant establishment has submitted the application form, supplementary document and the signed Certification Agreement.

If the application establishment fulfils all of the requirements in the review, the Certification Body shall grant the Green Key certification.

If the applicant establishment does not fulfil one or more of these requirements, the Certification Body shall not grant the Green Key certification.

The certification review and decision must be carried out within thirty (30) working days after the Certification Body receiving the audit report.

C. INFORMATION ABOUT THE CERTIFICATION DECISION

The Green Key National Operator (or Green Key International in countries without a National Operator) must be informed about the certification decision within five (5) working days after the Certification Body has taken the decision.

Where the Certification Body decides to issue the Green Key certification to an establishment, the Certification Body must send the following information to the Green Key National Operator (or Green Key International in countries without a National Operator) to send to the certified establishment:

- The Green Key certificate.
- Information about other available Green Key support material.
- Access to the Green Key logo, including the terms for using the logo.
- A copy of the audit report with any recommendations.
- A copy of the mutually signed Certification Agreement.
- Access to the Green Key audit satisfaction survey.
- Information about the desktop surveillance activities and other requirements during the certification period.
- Information about the suspension/withdrawal policy.
- Information about the complaints/appeals policy.

For certified establishments that have demonstrated an extraordinary level of conformity well above the minimum requirements, the Green Key National Operator (or Green Key

International in countries without a National Operator) will provide an additional acknowledgement in addition to the Green Key certificate.

Where the certification decision is to not issue the Green Key certification to an establishment, the Green Key National Operator (or Green Key International in countries without a National Operator) will prepare a communication to the establishment with the following content:

- A copy of the audit report and certification decision.
- Access to the Green Key audit satisfaction survey.
- Information about the complaints/appeals policy.
- Information about how to re-apply for Green Key certification.

The Green Key National Operator (or Green Key International in countries without a National Operator) must send the information about the certification decision within ten (10) working days after receiving the information from the Certification Body.

D. CERTIFICATE

The Certification Body must issue the Green Key certificate in the standard format prepared by Green Key International. It must include the Green Key ID number, the name and address of the establishment, the scope of the certification, the validity period (date of issue and date of expiry), a QR code linking to a short description about Green Key and the certification (including a legal scope disclaimer that conformity is based on a representative sample evaluated during an on-site certification audit), the name and signature of the Certification Body and the contact details of the Green Key National Operator (or Green Key International in countries without a National Operator).

E. CERTIFICATION VALIDITY

The validity of the Green Key certification shall be being clearly communicated to the certified establishment and is publicly available. The validity of the Green Key certification is 24 months. If a Green Key certified establishment only operates seasonally, the Green Key certification is still valid for 24 months, but the establishment will only need to conform with the Green Key requirements in the period(s) of operation. The certification period shall only start after the date of certification decision.

Around eight months ahead of the certification expiry date, the Green Key National Operator (or Green Key International in countries without a National Operator) will contact the certified establishment and encourage it to renew its certification, see also Appendix I with the Green Key timeline.

Green Key's policy regarding certification decisions determines the ongoing validity of the certification according to the conditions under which Green Key may suspend or withdraw the certification (see points 7C-7D below).

In very specific cases (for example after natural disasters), the Certification Body can exceptionally decide to extend the certification period for one or more establishments.

F. TRANSITION PHASE IN 2026-2028

As Green Key with this new manual is changing the validity period from 12 to 24 months as well as the audit frequency, there will be the following transition:

Establishments that apply for certification for the first time in the period 1 October 2026 – 31 December 2027 – and – Establishments that apply for re-certification in the period 1 October 2026 – 31 December 2027 and would be up for an on-site audit (according to the current certification system):

These applicant establishments will ensure conformity with new criteria and follow transition requirements related to conformity with guideline criteria. The applicant establishments will have an on-site certification audit done by a third-party auditor with certification by the Certification Body. The certificate will be valid for a 2-year period.

Establishments that apply for re-certification in the period 1 October 2026 – 31 December 2027 and would be up for an off-site audit (according to the current certification system):

These applicant establishments will ensure conformity with selected criteria as defined in the surveillance activities (new system). The applicant establishments will have a review of the conformity validated and certified by the Certification Body. The certificate will be valid for a 1-year period (extension of the current certificate).

Applicant establishments that have applied and have been audited before September 2026, will be authorized to finalise their application process under Green Key previous procedures by the end of 2026.

All Green Key establishments that are certified before 1 October 2026 but expire after 1 October 2026 must have undergone a third-party on-site or desktop audit.

G. REGISTRY OF CERTIFIED ESTABLISHMENTS

The Green Key National Operator (or Green Key International in countries without a National Operator) shall ensure that the general information for certified establishments is entered into the international Green Key database within one week after having received the information about the certification. The directory of certified establishments is publicly available on the Green Key website (map or list) during the period they hold a certification.

The Green Key National Operator (or Green Key International in countries without a National Operator) shall ensure that the information in the database is handled following data privacy regulations.

7. ONGOING CONFORMITY WITH CERTIFICATION REQUIREMENTS

A. INTRODUCTION

The certified establishment shall maintain conformity with the Green Key certification standard and requirements during the certification validity period.

The conformity will be ensured in the following way:

- Green Key's Certification Agreement with the certified establishment contains a clause that emphasises the establishment's obligations to maintain conformity with the Green Key requirements during the validity period and informing Green Key in case of changes that can affect the conformity.
- The desktop surveillance activities, that will take place within 8-14 months after certification, are carried out and verified by the Certification Body to confirm that the certified establishment demonstrates continued conformity with a selection of the Green Key criteria.
- Green Key has a system in place on its international website that encourages the establishment's guests and other stakeholders to provide feedback to Green Key about the establishment's conformity with the certification requirements.
- Green Key has a mechanism in place to respond to complaints or other types of feedback from any stakeholder, ensuring that all feedback is addressed (see Chapter 9).

B. DESKTOP SURVEILLANCE ACTIVITIES

Within the two-year certification period, all certified establishments shall participate in desktop surveillance activities. The aim of the desktop surveillance activities is to confirm ongoing conformity with the Green Key certification on selected criteria.

Within 8-14 months after the certification has been issued (see also Appendix I with the Green Key timeline), the Green Key National Operator (or Green Key International in countries without a National Operator) will contact the certified establishment to initiate the desktop surveillance activities.

The desktop surveillance activities include a review and verification of documents related to selected criteria as determined by Green Key (see Appendix F). The certified establishment must send the requested information and documentation to the Green Key National Operator (or Green Key International in countries without a National Operator) within the set timeframe. The certified establishment must as well pay the annual Green Key levy.

The Green Key National Operator (or Green Key International in countries without a National Operator) will collect and conduct a basic check of whether the required information/documentation has been received. If the Green Key National Operator (or Green Key International in countries without a National Operator) determines that the establishment has not provided all required information, the certified establishment will be recommended to provide the additional information before proceeding. The certified establishment can decide to have the certification confirmed by the Certification Body without following the recommendation by the Green Key National Operator (or Green Key International in countries without a National Operator).

The Green Key National Operator (or Green Key International in countries without a National Operator) shall, within ten (10) working days after receiving the required information, forward the information to the Certification Body. The Certification Body will review and verify the documentation and take the decision regarding ongoing conformity. The Certification Body must ensure that the authenticity of the information reviewed is verified.

The decision of the Certification Body regarding ongoing conformity with the requirements in the surveillance activities shall be communicated to the certified establishment and Green Key within thirty (30) working days after the Certification Body has received the material.

If the surveillance activities confirm full conformity with the selected criteria, the Certification Body will inform the certified establishment that it can continue the certification. If the surveillance activities reveal non-conformity with one or more of the selected criteria, the establishment will have to rectify its non-conformities and have it approved by the Certification Body. The establishment will have one month to have these non-conformities after surveillance activities rectified and approved by the Certification Body while still holding the certification. If the non-conformities after surveillance activities are not rectified and approved by the Certification Body within one month, the establishment will have its certification suspended (see Chapter 7C). If the non-conformities are not rectified during suspension within the set timeframe, the establishment will have its certification withdrawn (see Chapter 7D).

C. SUSPENDING CERTIFICATIONS

Suspensions occur when the Certification Body judges that an establishment is no longer conforming with the Green Key certification requirements during the certification period. A suspension can occur after feedback from the certified establishment regarding its non-conformity with Green Key requirements, after desktop surveillance activities demonstrating non-conformity with Green Key requirements (and not rectified/approved within one month), and/or after verified feedback/complaints received from guests or other stakeholders demonstrating non-conformity with Green Key requirements.

The purpose of the suspension is twofold:

- To reduce risk to the reputation of an establishment promoting that it has a sustainability certification when it does not conform with the Green Key requirements.
- To allow the establishment a reasonable period of time to demonstrate conformity before its certification is re-instated or withdrawn.

Green Key's policy regarding suspending certifications (see Appendix G) includes the following:

- The circumstances under which the certification of an establishment is suspended by Green Key.
- The actions and obligations of the Certification Body after the certification is suspended.
- The actions and obligations of the establishment after the certification is suspended.
- The actions and obligations of the Green Key National Operator (or Green Key International in countries without a National Operator) after the certification is suspended.
- The period within which the establishment must demonstrate renewed conformity with the criterion/criteria and/or other certification requirements in question so that the certification can be reinstated.
- The circumstances that would lead to the suspension being converted to a withdrawal.

During the suspension of the certification, the Green Key National Operator (or Green Key International in countries without a National Operator) ensures that the establishment is not included or shown as certified in any website listings or public reporting under Green Key's direct control. The Green Key National Operator (or Green Key International in countries without a National Operator) will also request the establishment to temporarily remove all references to Green Key in its material and communications.

D. WITHDRAWING CERTIFICATIONS

Withdrawing a certification means that the original expiry date of a certification is brought forward so that the certification expires earlier. Although there may be other reasons for withdrawing a certification, they typically fall under one or more of the following circumstances:

- The establishment no longer wishes to hold the Green Key certification.
- There has been a breach of the Certification Agreement, or one party has terminated the agreement.
- The Certification Body has legitimate reasons and evidence for losing confidence in the establishment's conformity with the Green Key certification standard, including if:
  - the establishment did not take corrective action after suspension of the certification;

- the establishment has had a significant change in the way they operate or a change in ownership affecting the conformity with the Green Key requirements;
- the establishment has been engaged in bribery or other criminal activity (demonstrated by official evidence);
- other, verified, reasons for believing that ongoing certification of the establishment could damage the reputation and credibility of the Green Key programme, the concept of sustainability certification and/or any other stakeholders involved in sustainability certification;
- Legislative changes in the region of the establishment raise significant sustainability concerns (for example, a location removes environmental legislation that the Green Key programme relied on to assess conformity with a specific criterion, or the local government introduces labour or human rights legislation that could lead to exploitation or abuse of the establishment's staff).

Green Key's policy regarding certification withdrawal (see Appendix G) includes the following:

- The circumstances under which a certification shall be withdrawn.
- The actions and obligations of the Certification Body when the certification is withdrawn.
- The actions and obligations of the establishment when the certification is withdrawn.
- The actions and obligations of the Green Key National Operator (or Green Key International in countries without a National Operator) when the certification is withdrawn.
- The conditions that the establishment must meet before it can again attempt to obtain the Green Key certification (the period to pass or the corrective actions to be taken.

The Green Key National Operator (or Green Key International in countries without a National Operator) shall hereafter ensure that the establishment is not included or shown as certified in in any website listings or public reporting under Green Key's direct control. The Green Key National Operator (or Green Key International in countries without a National Operator) will also request the establishment to permanently remove all references to Green Key in its material and communications.

8. CERTIFICATION AGREEMENT

The Certification Body must have a legally binding Certification Agreement that each establishment agrees to when submitting the application for Green Key. The certification agreement (see Appendix C) contains clauses that address the following:

- The establishment will accommodate auditing and any quality control activities that is required to obtain and maintain the Green Key certification.
- The Certification Body retains full control of decisions relating to issuing, suspending, and withdrawing certifications.

- The establishment's obligations of maintaining conformity with the Green Key certification requirements during the certification period, and what will happen if the establishment does not maintain conformity (certification suspensions or withdrawals).
- The establishment's obligations relating to the use of the Green Key trademark during the certification period (including how the Green Key logo can be used, how the standardised Green Key certificate or other material should be displayed, how to ensure correct information about Green Key, how to ensure no misrepresentation of the scope of the Green Key certification, etc.).
- Both parties' obligations regarding complaints from/about the establishment.
- Both parties' obligations regarding appeals from the establishment.
- Both parties' obligations regarding confidentiality and data protection.
- Both parties' obligations regarding anti-bribery and anti-corruption.
- Both parties' obligations regarding keeping the other party updated of changes (for example, how the establishment must communicate changes to their operation that may affect conformity or keep Green Key updated regarding changes in contact information)..

9. COMPLAINTS AND APPEALS

Green Key has a publicly available policy (see Appendix H) with a documented process on how to receive, evaluate and make decisions on complaints and appeals.

The Green Key Policy clarifies the appropriate external entity to have the authority and responsibility for the complaint and appeal process depending on the type of complaint and appeal.

The Certification Body shall record and track complaints and appeals, as well as actions undertaken to resolve them. The documented process shall contain the following:

- Upon receipt of a complaint or appeal, the Green Key National Operator (or Green Key in countries without a National Operator) acknowledges receipt of a formal complaint or appeal.
- The Green Key National Operator (or Green Key International in countries without a National Operator) is responsible for forwarding the received complaint/appeal and supplementary information to the Certification Body for further handling (review and decision).
- The Certification Body confirms whether the complaint/appeal relates to the certification activities that fall under the Green Key.
- The Certification Body ensures the investigation of the complaint/appeal and that the decision in relation to the complaint/appeal is taken.
- The Certification Body communicates the decision to the Green Key National Operator (or Green Key International in countries without a National Operator)
- The Green Key National Operator (or Green Key International in countries without a National Operator) provides the feedback to the complainant/appellant with the outcome

of the investigation and the decision related to the complaint/appeal.

10. APPENDICES

Appendix A: Pre-screening process document

Appendix B: Certification application and audit form

Appendix C: Certification Agreement

Appendix D: Auditing methods

Appendix E: Green Key's policy on impartiality, objectivity, confidentiality, non-discrimination, anti-bribery and anti-corruption

Appendix F: Desktop surveillance activities

Appendix G: Green Key's policy on suspension and withdrawal

Appendix H: Green Key's policy on complaints and appeals

Appendix I: Green Key's timeline for application, certification period and re-certification