



RULES OF PROCEDURE

of the Independent Expert Committee for System Monitoring of
the ECOCAMPING Certification

Entry into force: 31/03/2026



Section 0 Definitions

For the purposes of these Rules of Procedure, the following definitions apply:

Auditor:

External person who is approved by the certification body to conduct audits and is authorized to carry out certification audits.

Serious deficiencies:

Breaches that endanger the functionality of the certification system, lead to misleading consumers or violate legal requirements.

Secretariat:

ECOCAMPING Service GmbH, which provides administrative support to the Committee but has no decision-making authority on technical matters.

System owner and certification body:

ECOCAMPING e.V., which as the owner and operator of the ECOCAMPING certification system defines the certification criteria and carries out the certification of campsites.

Label user:

Certified campsite operators who are entitled to use the ECOCAMPING sustainability label.

Section 1 Purpose, institutional position and tasks

The Independent Expert Committee (hereinafter the "Committee") is a special body established by the statutes of ECOCAMPING e.V. for the independent monitoring of the ECOCAMPING certification system in accordance with the requirements of Directive (EU) 2024/825 (EmpCo Directive) and its implementation in the German Act Against Unfair Competition (UWG, section 2 subsection 2 no. 6).

In accordance with section 5 of the statutes of ECOCAMPING e.V., the Committee is an optional body within the meaning of section 40 of the German Civil Code (BGB) with structural independence.

The Committee acts as an independent third party within the meaning of the relevant legal provisions.

In performing its monitoring tasks, the Committee is not subject to any technical instructions from ECOCAMPING e.V., ECOCAMPING Service GmbH or any other bodies.

This means in particular:

- The Executive Board cannot issue instructions to the Committee regarding technical decisions.
- The General Assembly cannot revoke, amend or overrule decisions of the Committee.
- No bodies of the association may impair the independence of the Committee.
- The Committee is bound exclusively by the applicable requirements of the UWG and by these Rules of Procedure.
- It acts in line with principles based on international standards and functions as a mechanism to safeguard the impartiality of the certification system.

The members of the Committee are appointed by the Executive Board of ECOCAMPING e.V., but in their technical work they act solely on the basis of these Rules of Procedure. The Executive Board has no right to issue instructions regarding technical decisions of the Committee.

Administrative support for the Committee is provided by ECOCAMPING Service GmbH as the Secretariat. The Service GmbH acts solely on behalf of and in accordance with the instructions of the Committee. The Committee has sole decision-making authority over the agenda, scope of review, documentation and communication.



The Committee is authorized and obliged to define and further develop the review methodology required for its monitoring activities. The review methodology is based on internationally recognized standards.

Tasks of the Committee:

- The Committee reviews the certification criteria at regular intervals, at least every 3 years, to ensure they are up to date and legally compliant. Additional ad hoc reviews are carried out in the event of changes in the relevant legal provisions (including: UWG, EU Ecolabel for tourist accommodation, ISO 17065) or upon a substantiated request by the Secretariat.
- Risk-based sampling review: The Committee conducts sampling reviews of certification decisions on the basis of a risk-based approach. The selection of cases to be reviewed is carried out systematically and documented according to risk criteria (e.g. auditors acting for the first time, cases with nonconformities, complaint-related audits).
- Auditors (requirements and monitoring): The Committee reviews the independence and impartiality of auditors on the basis of the independence declarations submitted, proof of qualifications (CV, training) and potential conflicts of interest, and defines the requirements for auditors. Approval of auditors is granted by the certification body (ECOCAMPING e.V.) on the basis of the Auditors checklist (to be linked).
- Complaints management: Complaints against certification decisions or auditor approvals are submitted to the Secretariat (ECOCAMPING GmbH) (office@ecocamping.de). The Secretariat forwards them to the Committee. The Committee conducts an independent, documented review and issues a written recommendation. Auditors, the system owner and the label users have the right to lodge a complaint against the rejection of certifications or against non-approval as an auditor.
- Strategic advice: The Committee may issue recommendations for the further development of the certification system.
- Activity report: The Committee prepares an annual public activity report in which it reports on the monitoring measures carried out and their results. This report is published in the first quarter of the following year.
- The Committee has the authority, in the event of serious deficiencies in the certification process, to order the suspension of individual certificates and to issue binding instructions for remedying deficiencies. In the event of repeated non-compliance with binding instructions, the Committee may, by a two-thirds majority, order the suspension of the entire certification system. The system owner may object to this in writing within 2 weeks on legal grounds only; the suspension remains in place until the legal issue has been clarified.

Section 2 Composition and independence

Section 2 (1): Members and appointment procedure

The Committee consists of 3 independent members with the following preferred expertise:

- Member 1: Tourism/sustainability expert
- Member 2: Environmental/sustainability expert (NGO, authority or comparable)
- Member 3: Certification/audit expert or consumer protection representative

The members of the Committee are appointed by the Executive Board of ECOCAMPING e.V. The General Assembly has a right of veto if there are substantiated doubts about independence or qualifications.

The appointment procedure is transparent and follows these steps:

- The Executive Board of ECOCAMPING e.V. documents the selection criteria and selects suitable candidates.
- The Executive Board reports to the General Assembly on the intended appointment and on the statements received.
- The General Assembly may, by simple majority, raise an objection against one or more candidates if there are substantiated doubts about their independence or qualifications.
- In the event of an objection, the Executive Board nominates replacement candidates within 8 weeks and repeats the procedure.



- If no objection is raised, the appointment is made by the Executive Board immediately after the General Assembly.
- The Committee is presented on the ECOCAMPING website.

Section 2 (1a): Principles of working methods

In its monitoring activities, the Committee is guided by internationally recognized principles for independent monitoring bodies. This includes in particular:

- **Impartiality:**
The Committee ensures through its composition and working methods that decisions are taken free of conflicts of interest.
- **Competence:**
The members of the Committee have proven professional competence in their respective fields.
- **Responsibility:**
The Committee bears responsibility for its decisions and for their documentation.
- **Openness and transparency:**
The Committee's working methods, criteria and results are documented publicly.
- **Confidentiality:**
Trade secrets and personal data are protected in accordance with section 5 (3).
- **Handling of complaints:**
A transparent complaints management system has been established in accordance with section 1, bullet point 4.

Section 2 (2): Independence requirements

All members of the Committee must be 100% independent from:

- ECOCAMPING e.V. and ECOCAMPING Service GmbH (no position in a governing body, no employment, no ongoing consulting or business relationships),
- the certified campsites or campsites applying for certification and their affiliated companies (no economic interest, no position in a governing body, no ongoing consulting mandates).
- Members of the Committee may neither be employed by nor predominantly work for organizations that are involved in the ECOCAMPING certification system as system owner, Secretariat or certified companies.

The members of the Committee submit a declaration of independence at each election. Any changes in their situation that could impair independence must be reported immediately to the Chair of the Committee.

Section 2 (3): Qualifications

Minimum requirements for professional expertise:

- Demonstrable professional expertise in the relevant field (in particular tourism, environmental protection, certification)
- Proven competence through a curriculum vitae and relevant qualifications
- Willingness to perform activities in an impartial and objective manner

Section 2 (4): Term of office and early termination

- The Committee is appointed for a term of 3 years. Reappointment is possible; however, the maximum total term of office is limited to 9 years (3 terms) in order to ensure independence and regular renewal of expertise.
- An exceptional extension is only possible if the General Assembly approves with a two-thirds majority and a substantiated risk to the functioning of the Committee is demonstrated. A maximum of one additional term (12 years in total) is allowed.
- Early termination: If a member of the Committee leaves office prematurely, the Committee may continue to work and take decisions temporarily with the 2 remaining members. The Executive Board of the association ensures that a new member is nominated in a timely manner.



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Section 3 Meetings and resolutions

Section 3 (1): Meetings

- As a rule, the Committee meets 2 times a year. This format provides sufficient coordination and flexibility. Format: Meetings are generally held online via video conference (Zoom, Teams or similar). A physical meeting is possible at the request of the members of the Committee or the Secretariat. Invitation: At least 2 weeks before each meeting with a written agenda.

Section 3 (2): Chair

The members elect a Chair from among their number for a term of 3 years.

Section 3 (3): Quorum

The Committee has a quorum if at least 2 of the 3 members are present (including online).

Section 3 (4): Voting and abstentions

- Decisions are taken by simple majority.
- In the event of a tie, the Chair has the casting vote.
- Abstentions: Abstentions do not count as a vote. The vote is taken on the basis of the yes or no votes cast.
- Written votes are permissible.

Section 3 (5): Minutes

Each meeting is minuted, recording the following information:

- Participants (present, excused)
- Agenda items
- Resolutions and the reasons for them
- Measures and responsibilities
- In the event of conflicts of interest: Documentation of the abstention and the agenda item concerned
- Minutes are archived and submitted to the members of the Committee for approval.

Section 3 (6): Preparation and follow-up

Preparation and follow-up of meetings are carried out by the Secretariat (ECOCAMPING Service GmbH).

The Secretariat:

- Prepares draft agendas; the final agenda is approved by the Chair of the Committee,
- Collects and prepares documents as specified by the Committee,
- Coordinates organizational aspects with the members of the Committee (scheduling, sending invitations, technical preparation),
- Drafts minutes: final minutes are approved by the Committee,
- Implements measures as decided by the Committee.



The Secretariat has no decision-making authority in technical or strategic matters. All substantive decisions rest exclusively with the Committee.

Section 4 Working methods and procedures

Section 4 (1): Risk-based sampling review

The Committee regularly conducts risk-based sampling reviews. The selection of certification decisions to be reviewed is carried out systematically according to the following criteria:

- Cases in which auditors are acting as assessors for the first time (the first 2 audits)
- Cases with identified nonconformities or deficiencies (100%)
- Cases related to complaints (100%)
- Specifically selected routine cases for plausibility checks (10% of new certifications)
- Additional ad hoc reviews at the Committee's discretion

Documentation:

The selection and results of the sampling reviews are documented systematically and communicated to the Executive Board of ECO CAMPING (system owner). Results are summarized in anonymized form in the annual report.

Decision-making authority:

The Committee decides on the selection and assessment of the sampling reviews. The Secretariat prepares the review documents and coordinates the operational implementation.

Section 4 (2): Regular system review

Timeline:

- The Committee conducts a system review every 3 years.
- Ad hoc system reviews: Additional reviews are carried out in the event of changes in the relevant legal provisions or on recommendation of the Secretariat.

Subject of the review:

- Up-to-dateness of the certification criteria
- Whether appropriate experts and stakeholders were involved in the development and revision of the certification criteria (section 2 (2) no. 6b UWG).
- Legal conformity with the relevant legal provisions
- Harmonization with reference standards (e.g. VSME Standard, EU Ecolabel for tourist accommodation and others where applicable)
- Outcome: Recommendations are formulated in writing and submitted to the Executive Board for comments.

Section 4 (3): External auditors – requirements for approval and monitoring

The Committee lays down in writing:

- The minimum requirements for the professional qualifications of auditors.
- The requirements for maintaining approval (annual continuing education or practice).
- The independence criteria for auditors (no economic interest, no conflict with the employer, disclosure obligations).

Approval of auditors is granted by the certification body.

Monitoring of auditor approval

- The Committee performs random checks of auditor approvals.



Monitoring of audit quality

The Committee conducts risk-based sampling reviews of audit reports.

In doing so, it reviews:

- the technical correctness and completeness of the audit reports,
- compliance with the methodological audit requirements (evidence),
- the independence of the auditor in the specific case.

The results are documented in the Committee's internal review report and, in the event of repeated deficiencies, the Committee may suspend or withdraw the auditor's approval.

Sanctions and withdrawal of auditor approval

In the event of serious or repeated breaches of independence, competence or procedural principles, the Committee may, by simple majority, temporarily suspend or permanently withdraw the auditor's approval. The decision must be communicated and justified in writing to the auditor, the certification body and the Secretariat. The auditor may lodge a complaint against this in accordance with section 4 (4).

Section 4 (4): Complaints management

Complaints procedure:

Complaints against certification decisions or auditor approvals are to be submitted in writing to the Secretariat of ECO CAMPING Service GmbH (office@ecocamping.de). The Secretariat forwards them to the Committee.

The Committee:

- Reviews the complaint for completeness,
- Hears the parties involved (auditors, campsite operators, and, where applicable, the Secretariat),
- Conducts an objective assessment,
- Issues a written recommendation.

Right of complaint for auditors:

Auditors have the right to lodge a complaint with the Committee against the refusal of certifications or against their non-approval as auditors.

Form and deadline for complaints:

Complaints must be submitted in writing by email within one month of receipt of the contested certification decision or decision on non-approval as auditor. Late complaints may be considered at the Committee's discretion if a comprehensible reason for the delay is provided.

Minimum content of the complaint:

The complaint must at least contain:

- Name and contact details of the complainant,
- Designation of the certification decision concerned (date, business, auditor) or designation of the decision on non-approval as auditor,
- A brief description of the reasons for the complaint, including any relevant documents.

Procedure and deadlines

The Committee ensures through appropriate organizational measures that:

- receipt of the complaint is confirmed to the complainant within two weeks,
- as a rule, a decision on the complaint is made within three months after complete receipt of the documents. In complex cases, this period may be reasonably extended, in which case the complainant is to be informed.

Documentation

All complaints, process steps, hearings of the parties and the final recommendation of the Committee are documented in writing. An anonymized analysis (number, categories, outcomes) is published in the annual



activity report. Documentation is carried out by the Secretariat of the Committee.

Independence in handling complaints

No persons who were directly involved in the original certification decision may participate in the decision on complaints relating to certification. This applies in particular to the auditor concerned.

Section 4 (5): Definition and further development of the review methodology

The Committee defines the basic methodology for system monitoring and further develops it.

This includes in particular:

- Criteria for risk-based sampling in accordance with section 4 (1)
- Review procedures for the regular system review in accordance with section 4 (2)
- Requirements for auditors and monitoring of audit quality
- Procedural standards for complaints management

The review methodology is documented in writing by the Committee and brought to the attention of the system owner. The system owner may submit suggestions for further development, but the final decision rests with the Committee. The reviews are carried out operationally by the Committee itself or by independent auditors or third parties commissioned by the Committee. Changes to the review methodology enter into force after documentation and information of the parties concerned, with a transition period of at least 3 months.

Section 4 (6): The detailed review methodology is described separately in Annex 1 (Review methodology).

Section 4 (7): Strategic advice

- The Committee issues recommendations for the further development of the certification system at the request of the system owner or on its own initiative. The recommendations must be substantiated and are summarized in the activity report.

Section 5 Financing and resources

Section 5 (1): Expense allowance

A flat-rate annual expense allowance is determined by the Executive Board in consultation with the members of the Committee. This amounts to EUR 500 per year. Travel expenses are additionally reimbursed for in-person meetings (including, for example, second-class train tickets and, where necessary, accommodation).

Section 5 (2): Provision of documents and infrastructure

ECOCAMPING e.V. provides the Committee with:

- Certification documents and decision documents
- Catalogue of criteria and audit standard
- Technical infrastructure for video conferences
- Office and working materials

Section 5 (3): Duty of confidentiality

The Committee is subject to a duty of confidentiality with regard to:

- Trade secrets of ECOCAMPING e.V.,
- Personal data of campsite operators,
- Non-public grounds for decisions,
- Negotiation content and internal discussions.

Exception: anonymized publication of findings in the annual activity report.

Confidentiality agreement: Each member of the Committee signs a written confidentiality agreement upon taking office.



Section 5 (4): Financing

The financing of the Committee is provided on a lump-sum basis and is not linked to individual decisions, the number of certificates granted or other variable parameters. The expense allowance is contractually fixed for the entire term of office and cannot be unilaterally reduced or withdrawn by the system owner during the term.

Section 6 Public relations and reporting

Section 6 (1): Annual activity report

Each year, the Committee prepares a public report containing:

- Members of the Committee (names, qualifications)
- Monitoring activities (number of meetings, reviews, complaints)

Findings (general, no individual cases):

The Committee has findings regarding the following topics:

- Audit procedures and audit quality: functioning well/with potential for improvement
- Complaints handling: functioning/with delays
- Auditors' qualifications: up to date/partially outdated
- Auditors' approval

System review at least every 3 years:

[In years with a system review, additionally:]

- System review carried out: yes / no
- General findings on system continuity

Conclusion:

The ECOCAMPING certification system is functioning:

- properly,
- with potential for improvement,
- with significant deficiencies.

The report is published on the ECOCAMPING e.V. website.

Section 6 (2): Confidential technical report (internal)

In addition, the Committee prepares a confidential detailed report for the system owner including:

- Specific monitoring results (individual cases, campsites),
- Specific identified nonconformities,
- Specific recommendations for remedial action,
- A request for a written response (30 days).

Section 6 (3): Communication of the composition of the Committee

The following are published on ecocamping.de:

- Names and qualifications of the members of the Committee
- Main areas of expertise
- Confirmation of the current declarations of independence

Section 7 Conflicts of interest

Section 7 (1): Duty of disclosure

Members of the Committee must disclose potential conflicts of interest immediately:

- Upon taking office (in writing in the declaration of independence)
- At each meeting before votes are taken (if relevant)



- In the event of a change in their personal or economic situation

Section 7 (2): Handling of conflicts of interest

In the event of an identified conflict of interest:

- The member concerned undertakes to abstain from voting on the relevant item.
- The abstention and the agenda item concerned are recorded in the minutes.

In this way, transparency and independence of the Committee are ensured.

Section 8 Liability-related safeguards

Liability towards the association:

The Committee is liable towards the association only in cases of intent or gross negligence.

Indemnification against claims by third parties:

- The association indemnifies the members of the Committee against claims by third parties arising from the performance of their duties as members of the Committee, provided that the members have not acted intentionally or with gross negligence.

Pecuniary loss liability insurance

The association takes out pecuniary loss liability insurance (Directors & Officers Liability – D&O) for the members of the Committee:

- Minimum cover: EUR 1,000,000 per claim,
- The deductible is minimized (target: zero, if available).

Proof of insurance:

The association ensures insurance cover for the entire term of office.

The Committee receives annual proof of valid cover.

Clarification:

These liability privileges apply regardless of whether an expense allowance is paid. They are not dependent on the activity being “remunerated”.

Section 9 Final provisions

In the event of fundamental differences of opinion between the Committee and the system owner, external mediation may be conducted by a mediator jointly appointed by both parties.

Section 9 (1): Period of validity

These Rules of Procedure enter into force on xx.xx.2026 and remain valid until revoked.

Section 9 (2): Amendments

Amendments to these Rules of Procedure must be adopted unanimously by the Committee and approved by the Executive Board of ECOCAMPING e.V.

Section 9 (3): Severability clause

If individual provisions of these Rules of Procedure are or become invalid, the remaining provisions shall remain in force. The Executive Board is requested to replace the invalid provisions with valid ones.



Signatures

Chair of the Committee:

Name (block letters): _____

Signature: _____

Date: _____

Member of the Committee 2:

Name (block letters): _____

Signature: _____

Date: _____

Member of the Committee 3:

Name (block letters): _____

Signature: _____

Date: _____