



# Competence and Independence Statement

## Independent Monitoring Body for Good On You Sustainability Label Scheme

Issued by: Odonata Certification Services GmbH  
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### 1. Purpose and scope

This statement sets out how Odonata Certification Services GmbH (“Odonata”) meets the competence and independence requirements applicable to its role as the Independent Monitoring Body (IMB) for the Good On You Sustainability Label Scheme (“the Scheme”).

### 2. Legal standing and organisational separation

Odonata Certification Services GmbH is a limited liability company registered under German law. Odonata was founded by the not-for-profit independent certification scheme TourCert based in Stuttgart, Germany. Odonata is legally and organisationally separate from Good On You Pty Ltd (ABN 75 608 419 085) and from all brands rated under the Scheme.

Odonata has no ownership interest in Good On You and Good On You has no ownership interest in Odonata. There is no shared board membership, shared governance structure, or shared financial dependency between the two organisations. Good On You has no authority to direct, influence, or veto Odonata's monitoring findings or conclusions.

Odonata's engagement with Good On You is governed by the IMB Terms of Reference, which specifies independence requirements as a condition of appointment. Those terms are published on the Good On You website.

### 3. Independence from the Scheme Owner

The following structural and procedural safeguards protect Odonata's independence from Good On You in its monitoring role.



### **3.1 Structural safeguards**

- Odonata and Good On You are separate legal entities with no shared ownership, board membership, or governance structure.
- Odonata's fee for IMB services is fixed and not contingent on rating outcomes, commercial performance of rated brands, or Good On You's revenue. The fee structure is documented in the IMB service agreement.
- Odonata's monitoring findings and reports are the product of Odonata's independent assessment and are not subject to Good On You's approval or editorial control. Good On You may respond to draft findings in writing, but Odonata retains sole authority to determine and publish its conclusions.

### **3.2 Advisory activity**

Odonata's designated Managing Director Frank Brinkschneider provided advisory input during the design of the Scheme's assurance model. This input was limited to assurance and monitoring system design, how the monitoring programme is structured, what it reviews, and how findings are reported. It did not extend to Good On You's substantive rating methodology, rating criteria, rating thresholds, or individual rating decisions. This separation was maintained as a condition of appointment and is documented in the IMB Terms of Reference.

Odonata's monitoring activities cover the operation of the Scheme against its published commitments. They do not include substantive assessment of whether Good On You's rating criteria are appropriate or correctly calibrated. Those matters fall outside Odonata's scope.

## **4. Independence from rated brands**

Odonata has no client relationship with rated brands arising from the rating process.

Odonata maintains an active conflict-of-interest management programme covering all personnel involved in monitoring activities. The programme includes:

- pre-assignment screening of all personnel against rated brands, to identify any personal or professional relationship that could compromise impartiality;
- written declaration of no conflict required from each assigned personnel member before monitoring activities commence;
- reassignment procedures where a conflict is identified or arises during an assignment;
- annual review of the conflict-of-interest register.

Odonata has not identified, as of the date of this statement, any commercial relationship between Odonata or its personnel and any brand rated under the Scheme.

## **5. Competence**

Odonata's competence to carry out the IMB role rests on three elements: the relevant experience of its personnel, the structured monitoring methodology applied, and the



organisational capability maintained to conduct sampling, case-file review, and management systems review.

### **5.1 Relevant personnel experience**

The IMB role is led by Frank Brinkschneider, designated Managing Director of Odonata Certification Services GmbH. Frank brings expertise in designing, operating, auditing, and improving sustainability assurance and certification systems. His work has covered evidence-based conformity assessment, audit programme design, certification body operations, quality management, digital assurance infrastructure, and independent assurance governance. This expertise is based on more than 25 years of professional experience, including senior roles at KPMG and FLOCERT, where he contributed to the development and operation of internationally recognised certification and assurance systems, as well as board-level engagement with Water Stewardship Assurance Services, the assurance body for the Alliance for Water Stewardship.

Frank holds a current appointment as designated Managing Director of Odonata and is also the founder of Credible & Fair Consultancy, where he works with organisations on assurance and governance system design.

### **5.2 Odonata's organisational context**

Odonata Certification Services GmbH was founded by TourCert gGmbH, a non-profit organisation with an established track record in sustainability certification for the tourism sector. TourCert uses Odonata to provide certification services within its own scheme, a form of operational endorsement that demonstrates Odonata's competence is recognised and relied upon by an established scheme owner operating in a different sector.

Where specialist input is required for a specific monitoring activity beyond Frank's expertise, Odonata draws on additional personnel with relevant subject-matter competence. All personnel involved in monitoring activities are subject to the conflict-of-interest programme described in Section 4.

### **5.3 Knowledge of sustainability assessment and evidence standards**

Odonata's monitoring personnel have working knowledge of:

- how sustainability rating methodologies are constructed and applied, including the use of publicly available brand and supplier information as rating evidence;
- evidence quality standards and the distinction between primary source disclosure, third-party verification, and secondary source information;
- the regulatory requirements applicable to sustainability labels under EU consumer information law, including the Empowering Consumers for the Green Transition Directive (EmpCo, Directive 2024/825);
- the design and operation of internationally recognised certification and assurance schemes, including Fairtrade and TourCert, providing comparative context for assessing scheme integrity and procedural consistency.



## 5.4 Organisational capability

Odonata maintains the organisational capability to carry out the monitoring activities specified in the IMB Terms of Reference, including:

- structured risk-based sampling of completed rating files;
- case-file review against defined criteria;
- statistical analysis of rating outcomes for patterns of commercial bias;
- annual management systems review covering quality management, competence management, complaints handling, and triggered review processes;
- documentary review of methodology governance and stakeholder consultation procedures.

## 6. Objective procedure

Odonata operates its monitoring activities against documented protocols and defined assessment criteria, as set out in the IMB Terms of Reference and internal procedure documents. Key procedural commitments include:

- Monitoring findings are traceable to the specific evidence reviewed. Each finding identifies the file, document, process, or record that supports it.
- Assessment criteria are defined in advance of each monitoring cycle and do not change during a review without documented justification.
- Findings are reproducible in the sense that a second competent reviewer, applying the same criteria to the same evidence, would be expected to reach the same or materially equivalent conclusion.
- Odonata's monitoring reports distinguish between findings, observations, and recommendations. Findings are conclusions supported by evidence. Observations are matters noted for attention that do not constitute findings of non-compliance. Recommendations are optional improvements beyond the scope of the monitoring criteria.

Odonata's monitoring findings are shared with Good On You in draft before finalisation, to allow factual corrections. Odonata retains sole authority to determine its conclusions.

## 7. Alignment with recognised standards

Good On You does not require formal accreditation of Odonata as a precondition of appointment. Odonata's competence and independence are instead demonstrated substantively by reference to recognised international standards, consistent with the approach permitted under Recital 7 of EmpCo and confirmed in the Commission's published FAQ on the directive (November 2025).

Odonata aligns its activities with the relevant principles of the following standards, which are used as reference frameworks for competence, impartiality, consistency, evidence-based assessment, and reporting.



Standard	Relevant principles applied	How demonstrated
<b>ISO/IEC 17065:2012</b>	Requirements for certification bodies: impartiality, competence, documented procedures, consistent decision-making, complaints and appeals.	Structural independence from Scheme Owner and brands (Section 2–4); documented monitoring protocols (Section 6); COI programme (Section 4).
<b>ISO/IEC 17021-1:2015</b>	Requirements for audit and certification of management systems: audit programme planning, evidence-based findings, audit team competence.	Annual management systems review methodology (Section 5.4); personnel competence requirements (Sections 5.1–5.2); sampling-based review programme.
<b>ISO/IEC 17029:2019</b>	Requirements for validation and verification bodies: applicable to claims-based assessment without bilateral engagement with the assessed entity.	Methodology-level monitoring of Good On You's processes rather than brand-by-brand audit; evidence traceability requirements (Section 6).

Odonata's appointment under the IMB Terms of Reference does not constitute formal accreditation under any of these standards. Odonata is able to demonstrate its substantive alignment with the requirements of these standards to Good On You and to competent national authorities on request.

## 8. Scope limitations

The following matters fall outside the scope of this statement and of Odonata's monitoring role.

- This statement does not constitute legal compliance certification. Legal compliance determinations rest with competent national authorities.
- Odonata's appointment does not constitute accreditation of Good On You or the Scheme by any national accreditation body.
- Odonata's monitoring is at the Scheme and process level. Odonata does not audit or certify individual brands, does not verify individual brand disclosures, and does not issue brand-level compliance statements. The absence of a finding on a specific rating in a given monitoring period does not mean that rating has been individually verified.
- Odonata does not make, confirm, overturn, or substitute individual rating decisions.
- Odonata does not evaluate the substantive appropriateness of Good On You's rating criteria or methodology.

## 9. Review and maintenance

This statement is reviewed and updated annually, or at any time that a material change occurs to Odonata's legal structure, personnel, or commercial relationships that could



affect the matters described herein. Good On You reviews Odonata's continued satisfaction of the competence and independence criteria in Section 9.2 of the Good On You Scheme Manual as part of the periodic scheme review described in Section 12.6 of the Good On You Scheme Manual.

Any material change to the matters described in this statement is notified to Good On You promptly and reflected in an updated version of this document. Version history is maintained.

**Frank Brinkschneider**

Designated Managing Director  
Odonata Certification Services GmbH

Signature: \_\_\_\_\_

Date: 26 June 2026