

CDM-AP64-A01

Information note

DOE/AIE coordination forum presentation

Version 01.1

DOE/AE Forum | *Werner Betzenbichler* | *April 2013*

AP-64

Interaction with DOE Forum

Topics

- Revisions
 - to the accreditation standard
 - and accreditation procedure
- Overlapping issues

General Comments on the Revision of Accreditation Docs

- A lot of work has been put into this
- Contains many good solutions
- Should toughen the accreditation system up to be applied for long time in CDM (even after completion of Marrakech Accords Review)...
- ...but also in other schemes (JI, NMM, FVA, NAMA etc.)
- This is the priority compared to meeting any deadlines

AS – Competence Requirements

- Priorities have changed:
 - During the last years it was important **that** additional experts can qualify as verifier/validators
 - Now it is consider important **how** experts can qualify as verifier/validators
- Proposed approach is considered as a more or less radical change compared to the recent one

AS – Competence Requirements (2)

- Aspects that need further consideration:
 - “grandfathering for recent staff” – e.g. by keeping qualification criteria for staff that has been appointed under version 4
 - Focus on skills to plan and perform validation and verification activities instead of “wasted knowledge” for formal completion of on-site teams
 - Risks of negative impacts on transaction costs (extension of teams, availability of resources)
 - Coverage of competences at time of accreditation

AS – Competence Requirements (3)

- Some recommendations:
 - Ensure that by the transition no DOE will lose a technical scope (negative signal to the market)
 - Ensure common understanding of AP, DOEs and assessment teams on the “interpretation” of competence requirements
 - Develop (jointly) guidelines and best practice examples that enable an appropriate and harmonized implementation

AS – Further Aspects

- Outsourcing to non-group companies can be taken out
- Contractual requirements to reflect business reality
(international contracts are frequently burdened by bureaucracy)
- Overcome inappropriate regulations of M & P (e.g. §98 publication of a procedure to allocate responsibility)
- “professional relationship” to a client should not include auditing when assessing CoI

AP – Performance Assessment

- Workshop showed preference for “hybrid option”
 - Predefined amount of assessments with scope depending on actual performance and volume of activities
 - No link to scopes of accreditation
 - Consider randomly selected activities (including PoA, re-validations, activity changes)
- One assessment report and assessment to be performed in an pre-defined time frame

AP – Performance Assessment (2)

- Define procedure for “non-operating” entities, e.g. a witnessed activity at restart of operations
- Avoid “double-punishment” by spot-checks and additional performance assessments
- Consider linking/combination of regular surveillance and performance assessment activities

AP – Under observation/ suspension/ withdrawal

- Restrictions are too tough
- Restriction of “under observation” might even disable the observation
- “under observation” may have implications to risk-based approach
- Stoppage of validation and verification work is at risk of DOE under suspension but can not be checked and should not be prohibited

AP – Further aspects

- Missing definitions and regulations (e.g. critical systematic persistent, scope of spot checks, lifting of status)
- Independence of the independent review process
- Approach of request to review of a final assessment report is very much welcomed

Overlapping issues

- Still some leeway for subjective decisions/recommendations by AT members
- CoI when recommending re-visits
- Request for creating a fee structure that is independent of travel costs

Take the time that is needed for revising these documents

Thank you for your attention!

Werner Betzenbichler
Chair of the DOE/AIE Forum

Werner.Betzenbichler@bece-experts.com

- - - - -

Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.1	30 April 2013	Editorial changes
01.0	30 April 2013	CDM-AP 64, Annex 1 Initial publication

Decision Class: Operational
Document Type: Information note
Business Function: Accreditation
Keywords: DOE forum, communications
