

Head and Members of the CDM Executive Board
Mr. Maosheng Duan
Chairman
UNFCCC Secretariat
Martin-Luther-King-Strasse 8
D 53153 Bonn
Germany

DOE/AE Forum

Mailing address:
Designated Operational Entities &
Independent Entities Association (D.I.A.)
c/o beCe carbon experts GmbH
Bahnhofstrasse 7
D - 85354 Freising
GERMANY

t: +49 81 61 234 65 02
office@diassociation.org
www.diassociation.org

Your contact:
Werner Betzenbichler
General Manager DIA
Chair of the DOE/AIE Forum

Date 30. April, 2012
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Subject **Call for public input on "Issues included in the annotated agenda of the sixty-seventh meeting of the CDM Executive Board and its annexes"**

Honorable Members of the CDM Executive Board,

This input has been prepared by the Chair of the DOE/AIE Forum after inviting all members of the DOE/AIE Forum to provide feedback on their experiences, concerns and to make suggestions for improvement. The following focusses on those aspects with special relevance for the DOEs.

Draft CDM Accreditation Standard (Annex 3)

As attachment to this letter, we provide a table listing our input to the Call for Input on the initial draft, the same paragraphs in the final draft and our new comments to this version. We regret to note that, we do not see many of our comments reflected. As most of the changes are not considered being crucial (rather editorial) we would finally point only to some few mistakes and paragraphs which create or do not correct ambiguous guidance and hope that these aspects will be corrected before approving the new version. This refers in particular to the need for clarity why at accreditation a single person covering a technical area is required, whereas at regular business two experts are a must. Furthermore, the expression "relevant educational background" appears vague with regard to some technologies, and finally in annex D the section referring to requirements for complex technical areas contains a list which includes non-complex technical areas.

Concept Note on Competence Requirements (Annex 12)

We appreciate the suggestion made by the AP for extending the validity period of the interim measure, and hope for a joint discussion on follow-up measures.

Concept Note on Sustainable Development Co-Benefits (Annex 13)

We express our support for promoting and developing tools to highlight co-benefits on a voluntary basis. We would like to direct the attention also to implications for the DOE work, and the following processes (completeness check, information and reporting check, DOE performance rating).

Concept Note on the Application of Materiality (Annex 16)

Unfortunately the fear expressed last time has proven to become true as the core paragraphs of the concept note is technically not correct and rather confusing than providing insight towards an appropriate application of the concept of materiality. It introduces new terms and never be-

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fore discussed, new procedures like the acceptance of trivial misstatements or the submission of verification reports with uncorrected errors. Thus we only consider the timeframe as useful and suggest that the Secretariat seeks further consultation with DOEs and DIA before starting to develop a draft standard.

More details will be provided and hopefully discussed during the regular interaction.

Kind regards,

A handwritten signature in black ink, appearing to be 'Werner Betzenbichler', enclosed within a circular scribble.

Werner Betzenbichler
Chair of the DOE/AIE Forum

Date
Subject

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Call for public inputs on "Issues included in the annotated agenda of the sixty-seventh meeting of the CDM Executive Board and its annexes"

Accreditation Standard: Changes in Version 04.0 from Draft1 to Draft 2

Paras commented by DIA

		1 st call for inputs (March 2012)			2 nd call for inputs (April 2012)	
#	Para No.	Text from draft 1 (V04.0)	Comment	Proposed change	Text from draft 2 (V04.0)	Comment
1	33	An AE/DOE shall have sufficient resources with the necessary competence relating to the type, range and volume of estimated/planned workload for each technical area in which the AE/DOE operates or intends to operate, within all CDM sectoral scopes in which the AE/DOE has applied for accreditation or has been accredited.	The expression “range” is unclear and leaves risks for various interpretations. Consequently there is also a risk of a non-harmonised approach along the accreditation process.	There is a need either to include a definition under section B or to delete this expression (recommended)	An AE/DOE shall have sufficient resources with the necessary competence relating to the type, range and volume of estimated/planned workload for each technical area in which the AE/DOE intends to operate or operates, within all CDM sectoral scopes in which the AE/DOE has applied for accreditation or has been accredited.	Comment not taken into account.
2	37	The personnel performing validation and/or verification activities, irrespective of whether they are employed full time or part time or are internal or external resources, shall be under the supervision of a responsible senior executive of the AE/DOE.	Clarification is required, as audit teams employed by company affiliates have contractual and reporting lines in the respective company affiliates not necessarily the DOE itself. It is not practical and realistic to expect this reporting line for all audit teams. The term supervision might be interpreted in various manner by ATs.	It might be useful amending this paragraph in the following manner: “Supervision in this context does not refer to reporting lines and control of human resources in term of employment, but to the control of validation and verification activities”	The personnel performing validation and/or verification activities, irrespective of whether they are employed full-time or part-time or are internal or external resources, shall be under the responsibility of a senior executive of the AE/DOE.	Change from “under the supervision” to “under the responsibility” may even more be interpreted to require direct reporting lines.
3	39	The AE/DOE shall maintain relevant records related to recruitment.	What documents are required? It should be noted that the type of records a company can keep are treated in different ways by various countries (legally), in particular for employees that have left the company.	Recommendation: “The AE/DOE shall maintain relevant records related to the appointment process of all technical experts, auditors and technical reviewers. This record shall document the assessment by the responsible senior executive of the DOE/AE, while referenced proofs shall be treated according to the applicable legislation.”	The AE/DOE shall maintain relevant records related to recruitment.	Comment not addressed but ok
4	40	An AE/DOE may use external individuals (validators, verifiers, technical experts, team leaders and technical reviewers) on a contractual basis to supplement its internal resources, as provided for in paragraph 34 (c) above. In such cases, the AE/DOE shall establish, implement and maintain a documented procedure for engaging external individuals.	The reference is to para 35 (c) not 34 (c).	...provided for in paragraph 35 (c) above.	An AE/DOE may use external individuals (validators, verifiers, technical experts, team leaders and technical reviewers) to supplement its internal resources, as provided for in paragraph 35 (c) above. In such cases, the AE/DOE shall establish, document, implement and maintain a procedure for engaging external individuals.	OK
5	41	The procedure shall ensure that provision of services by an external individual to an AE/DOE be defined in a written contract between the AE/DOE	The use of the terms “contract for individuals” and “sub-contracting” creates confusion and difficulties when hiring external resources, and	41. The procedure shall ensure that provision of services by an external individual to an AE/DOE be defined in an “appointment declaration”	The procedure referred to in paragraph 40 above shall require having a written agreement ⁷ from the external individual	Ok, we can live with a written agreement instead of appointment declaration.

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		and the individual. The contract shall include an agreement from the external individual to comply with the AE/DOE's policies, procedures and quality management system. The contract shall address confidentiality and independence from commercial and other interests. The contract shall also require the external individual to notify the AE/DOE of any existing or prior association with any CDM PP of the CDM PA they may be assigned to validate or verify as well as actual or potential involvement in identification, development or financing of CDM activities. The contract may state that the payment for the services is to be made to a company instead of the external individual.	<p>detracts from the original objective of these paragraphs. It also leads to differences in interpretations among DOEs and ATs. The contractual arrangements limited to individuals can limit the access to resources for CDM work.</p> <p>And as soon as this agreement is made, §44 immediately reassess the arrangement as "Subcontracting" and not "Use of External Individuals". In real life, the border between "External Individuals" and "Subcontractor" is very much overlapping (e.g. in most countries, also real individuals (not being linked to any organization/company) also needs to be registered by the county's tax authorities as "self-employed" and entered into a company registered becoming in effect "a one man company" under §44.)</p>	between the AE/DOE and the individual. The "appointment declaration" shall include an agreement from the external individual to comply with the AE/DOE's policies, procedures and quality management system. The "appointment declaration" shall address confidentiality and independence from commercial and other interests. The "appointment declaration" shall also require the external individual to notify the AE/DOE of any existing or prior association with any CDM PP of the CDM PA they may be assigned to validate or verify as well as actual or potential involvement in identification, development or financing of CDM activities. The "appointment declaration" does not necessarily encompass any provisions on payments for the services, which shall be treated by a separate contract between the AE/DOE and the external individual or the company he is employed by, including one-man companies.	to comply with the AE/DOE.s applicable policies and procedures. The agreement shall address confidentiality and independence from commercial and other interests. The agreement shall also require the external individual to notify the AE/DOE of any existing or prior association with any CDM PP of the CDM PA they may be assigned to validate or verify as well as actual or potential involvement in identification, development or financing of CDM activities.	
6	43	An AE/DOE may subcontract another legal entity (subcontractor) to provide specific technical expertise to supplement its internal resources, as provided for in paragraph 34 (d) above. Such technical expertise shall be limited to technical issues related to the CDM PA to be validated or verified, in accordance with paragraph 1 (f) (iii) of Appendix A to the CDM M&P. In such cases, the AE/DOE shall establish, implement and maintain a documented procedure for subcontracting.	The reference is to para 35 (d) not 34 (d).	...provided for in paragraph 35 (d) above.	An AE/DOE may subcontract other legal entities (subcontractors) to provide specific technical expertise to supplement its internal resources, as provided for in paragraph 35 (d) above. Such technical expertise shall be limited to technical issues related to the CDM PA to be validated or verified, in accordance with paragraph 1 (f) (iii) of Appendix A to the CDM M&P. In such cases, the AE/DOE shall establish, document, implement and maintain a procedure for subcontracting.	OK
7	43 - 46	Subcontracting 1 43. An AE/DOE may subcontract another legal entity (subcontractor) to provide specific technical expertise to	We think the distinction between "External Individuals" and "Subcontractor" should NOT be with regard to what roles the individuals can fill in CDM (... that should be the same for	We suggest to open subcontracting also for companies that engage individuals that may fulfil functions as covered by paragraph 40	Subcontracting ⁸ 43. An AE/DOE may subcontract other legal entities (subcontractors) to provide specific technical expertise to supple-	Still unclear whether a person from an affiliate of the DOE would be an external individual or a subcontractor. What is the difference between an agree-

¹ Subcontracting, as described in paragraphs 43–46, does not constitute allocation of functions to other sites as described in paragraphs 29–30 or the use of external individuals as described in paragraphs 40–42.

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		<p>supplement its internal resources, as provided for in paragraph 34 (d) above. Such technical expertise shall be limited to technical issues related to the CDM PA to be validated or verified, in accordance with paragraph 1 (f) (iii) of Appendix A to the CDM M&P. In such cases, the AE/DOE shall establish, implement and maintain a documented procedure for subcontracting.</p> <p>44. The procedure shall ensure that provision of services by a subcontractor to an AE/DOE be defined in a written contract between the AE/DOE and the subcontractor. If a contract is made between the AE/DOE and a company/legal entity, even if a one-man company, the services to be provided to the AE/DOE shall be treated as a subcontracting, and the requirements applicable to subcontracting shall apply.</p> <p>45. The AE/DOE shall remain responsible for the outcomes of the work carried out by subcontractors to comply with the requirements specified in the CDM M&P, the decisions of the COP/MOP and the Board.</p> <p>46. The AE/DOE shall evaluate subcontractors and their personnel to ensure they meet the relevant requirements contained in this Standard and the AE/DOE's systems.</p>	<p>both!) – or - if the contractual party from a legal point of view is a Company or an individual. The focus should be on how the DOE shall control key aspects like qualifications, Col, etc in case of the various arrangements. (These aspects are already covered in other parts of the Accreditation standard).</p> <p>We suggest to open subcontracting also for companies that employ one or several individuals who are qualified and who shall be engaged as external individuals. Some DOEs may make use of qualified CDM resources being individuals employed in other Group Companies (and where the office of this individual is not declared as an "Other Site "). It needs to be clear in the AS that this is allowed for all type of technical CDM roles and whether these situations shall be handled as "external Individuals" or as "subcontractors". Lack of clarity may limit the access to resources for DOE's in the midst of the most hectic time period ever for CDM!</p>	<p>4. Subcontracting</p> <p>43. An AE/DOE may subcontract another legal entity (subcontractor) to provide specific technical expertise or to provide access to external individuals to supplement its internal resources, as provided for in paragraph 35 (d) above. Such technical expertise shall be limited to technical issues related to the CDM PA to be validated or verified, in accordance with paragraph 1 (f) (iii) of Appendix A to the CDM M&P. In such cases, the AE/DOE shall establish, implement and maintain a documented procedure for subcontracting.</p> <p>44. The procedure shall ensure that provision of services by a subcontractor to an AE/DOE be defined in a written contract between the AE/DOE and the subcontractor. If a contract is made between the AE/DOE and a company/legal entity, even if a one-man company, the services to be provided to the AE/DOE shall be treated as a subcontracting, and the requirements applicable to subcontracting shall apply. If the subcontracted company provides access to external individuals, "appointment declarations" should be signed additionally with each individual.</p> <p>45. The AE/DOE shall remain responsible for the outcomes of the work carried out by subcontractors to comply with the requirements specified in the CDM M&P, the decisions of the COP/MOP and the Board.</p> <p>46. The AE/DOE shall evaluate subcontractors and their personnel to ensure they meet the relevant requirements contained in this Standard and the AE/DOE's systems.</p>	<p>ment its internal resources, as provided for in paragraph 35 (d) above. Such technical expertise shall be limited to technical issues related to the CDM PA to be validated or verified, in accordance with paragraph 1 (f) (iii) of Appendix A to the CDM M&P. In such cases, the AE/DOE shall establish, document, implement and maintain a procedure for subcontracting.</p> <p>44. If a contract is made between the AE/DOE and a company/legal entity, even if a one-person company, the technical expertise to be provided to the AE/DOE shall be treated as subcontracting, and the requirements applicable to subcontracting shall apply.</p> <p>45. The AE/DOE shall evaluate the subcontractor and its personnel to ensure they meet the relevant requirements contained in this Standard and the AE/DOE.s systems.</p> <p>46. The AE/DOE shall remain responsible for the outcomes of the work carried out by the subcontractor to comply with the requirements specified in the CDM M&P and the decisions of the COP/MOP and the Board.</p> <p><i>8 Subcontracting, as described in paragraphs 43.46, does not constitute allocation of functions to other sites as described in paragraphs 29-30 or the use of external individuals as described in paragraphs 40-42.</i></p>	<p>ment and a contract?</p>
8	54	A technical reviewer shall have the necessary competence to conduct technical reviews, which includes	The paragraph of AS V3.0 talks about the "technical review", while the AS V4.0 §54 use the phrase "technical	The text may be shifted back to V3.0 language or new text may be added to §54 indicating that lacking TA require-	59. The personnel conducting a technical review shall collectively have the necessary competence, which includes	OK

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		knowledge relevant to the technical area(s) of the CDM project activity being validated or verified.	reviewer" (i.e. changing from talking about the function to be talking about an individual). This may be read as though the TA competence needs to be found in the individual person doing the technical review and not being a competence requirement for the team that perform the Technical review together. §18 opens up for the technical review being done by more than 1 person and it should be enough that one of the persons doing the technical review holds the TA competence.	ment may be handled by involving another person with TA competence to the technical review team.	knowledge relevant to the technical area(s) of the CDM project activity being validated or verified.	
9	64	In establishing, implementing and maintaining its qualification procedure, the AE/DOE shall ensure that: (a) At least one validator/verifier, technical expert or team leader is qualified for each technical area in which the AE/DOE operates or intends to operate, within all CDM sectoral scopes in which the AE/DOE has applied for accreditation or has been accredited; and (b) For a person to be qualified for a technical area, all qualification requirements prescribed in Annex D below, as a minimum, are fulfilled.	Given that the Technical review is meant to be an independent peer review, how can this be done with only one Technical Area expert? CDM ATs have previously not accepted the same expert being consulted by the technical review team.	If it is the intention of the standard to require 2 TA experts per sectoral scope under which a DOE intends to operate resources to one expert, it should be made clear. If this is not the intention of the standard, this should also be made clear. We can also imagine that the requirement of having a single TA is sufficient for accreditation, while in actual verification or validation the roles have to be fulfilled by two individuals. Again this needs a consistent application throughout all relevant procedures (incl. VVS).	In establishing, documenting, implementing and maintaining its qualification procedure, the AE/DOE shall ensure that: (a) At least one validator/verifier or technical expert is qualified for each technical area in which the AE/DOE intends to operate or operates, within all CDM sectoral scopes in which the AE/DOE has applied for accreditation or has been accredited; and (b) For a person to be qualified for a technical area: (i) All qualification requirements prescribed in Annex D below, as a minimum, are fulfilled; (ii) The ability to apply required knowledge and skills is demonstrated through evaluation of actual performance in validation/verification activities.	Still not clarified whether in fact one TA competent person is sufficient for obtaining accreditation while two are required for running a validation or verification. Diverging interpretations by DOEs and ATs should be avoided
10	66	An AE/DOE shall establish, implement and maintain a documented procedure for continually monitoring performance of all personnel performing validation or verification activities to ensure their competence is maintained. The procedure shall ensure maintenance and update of competence to keep current with new requirements, and shall take into account technological changes and changes in CDM requirements. The	Clarification is requested of what is intended with the term "on-the-job monitoring". For us this means that the review of the documents is a way of monitoring on-the-job, e.g. the TR monitors the performance of the team leader. But we do not expect this to be an obligation to have supervisors on site monitoring the work of team leaders. The previous version wording in Para 54 was quite different: "... including initial on-the-job evaluation	Insert in the definition section on-the-job monitoring e.g.: On-the-job monitoring of technical experts, validators, verifiers and technical reviewers is understood as a process that provides information and feedback by the supervising person (e.g. technical reviewer evaluates the team leader) on the performance of individuals engaged in validation and verification activities. The evaluation of	An AE/DOE shall establish, document, implement and maintain a procedure for continually monitoring performance of all personnel involved in CDM functions to ensure satisfactory performance and that their competence is maintained, including initial on-the-job performance evaluation. The procedure shall ensure maintenance and update of competence to keep current with new requirements, and shall take into account technological changes and changes in CDM require-	OK

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		procedure shall include on-the-job monitoring and evaluation of the performance of the personnel.	and subsequent monitoring and measurement of the performance...". A clear definition of on-the-job monitoring would avoid discussion with AT and cost implications by excessive expectations.	technical reviewers shall include the feedback of the registration or issuance process.	ments.	
11	71	An AE/DOE shall maintain up-to-date personnel records of management and administrative personnel and the personnel performing validation or verification activities including those external to the AE/DOE. These records shall include relevant evaluation, qualifications, training, experience, affiliations, professional status, and any consultancy services that may have been provided, as specified by paragraphs 113–118 below.	By law, in several countries companies are not allowed to keep records of people that have left the company.	This requirement shall be limited "to the extent permitted by law"	An AE/DOE shall maintain up-to-date personnel records of management and administrative personnel and the personnel performing validation or verification activities including those external to the AE/DOE. These records shall include relevant evaluations, qualifications, training, experience, affiliations, professional status, and any consultancy services that may have been provided, as specified by paragraphs 113-118 below.	Comment not addressed, but not that crucial
Issues not yet under revision						
12	165 (a)	This procedure shall ensure the following, at a minimum: (a) The DOE shall not have any direct relationship with its client other than validation and/or verification/certification work and third party conformity assessment;	This paragraph prohibits a DOE to enter into a contract with a project participant if the DOE already has other contractual relationships with the same client for other work than third party conformity assessments. At EB 60, the EB clarified that "The requirement of 166 (a) of the accreditation standard is applicable to the designated operational entities' (DOEs) other sites, as described in paragraph 28 (b) of the CDM accreditation standard". We have experienced that this is being interpreted by CDM ATs to not only apply to the office / group of persons to which CDM functions have been allocated, but to the legal entity as a whole to which this office / group of persons belongs. In our opinion, this goes beyond the intension of paragraph 166 (a). While we can agree that the offices / group of persons to which CDM functions have been allocated should not at the same time performing consultancy services for a CDM	Guidance to AT and DOEs is requested to ensure a common understanding of the requirement, which allows to follow the main objective, i.e. the safeguarding of impartiality without unnecessarily creating hurdles.	This procedure shall ensure the following, at a minimum: (a) The DOE shall not have any direct relationship with its client other than validation and/or verification/certification work and third party conformity assessment;	No changes

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			<p>customer, we do not agree that this shall also apply to other offices / group of persons belonging to the same legal entity, but not engaged in CDM validations and verifications.</p> <p>In our opinion, sufficient safeguards for ensuring impartiality can be implemented, so that the fact that another office / group of persons provides consultancy services (risk assessments etc, not CDM project development) to a CDM project participant does not impact the impartiality of the office / group of person performing CDM validation and verifications.</p>			
13	Annex D	<p>Annex D: Technical areas and qualification requirements</p> <p>Introduction</p> <p>1. This Annex lists and describes the technical areas within the CDM sectoral scopes, and prescribes the requirements for the qualification of personnel for these technical areas, as required in paragraphs 63–64 above. Meeting qualification requirements in this Annex do not exempt such personnel from meeting competence requirements prescribed in chapter IV. above.</p> <p>II. Sectoral scopes and technical areas</p> <p>2. The following table prescribes the minimum technical areas within the CDM sectoral scopes to be considered by an AE/DOE to qualify its personnel for technical areas. Each technical area is classified as “Complex” or “Non-complex” for the applicability of qualification requirements prescribed in sections III–V below.</p> <p>[Table]</p> <p>3. Other new technical areas in sectoral scope 4 (TA 4.n) and further division of complex technical areas shall be considered as complex tech-</p>	<p>The interim solution for extending the qualification validity in complex TA of validators and verifiers that cannot refer to the required minimum period of direct work experiences is ending these days. It was originally foreseen that alternative options will be developed (which is now foreseen to be delivered belated with phase II or the revision work).</p> <p>There are many CDM assessors who have successfully experienced many validation and/or verification activities as a certified validator or verifier to the final registration of the project activities and/or the issuance of CERs. Their competencies for validation/verification have been amply demonstrated by the successful registration/issuance of the project activities.</p>	<p>We would like to modify this requirement from transitional manner to stable manner or to extend the validity of the interim solution until alternative tracks have been established.</p>	<p>Annex D: Technical areas and qualification requirements</p> <p>I. Introduction</p> <p>This procedure shall ensure the following, at a minimum:</p> <p>(a) The DOE shall not have any direct relationship with its client other than validation and/or verification/certification work and third party conformity assessment;</p> <p>[Table]</p> <p>3. Other new technical areas in sectoral scope 4 (TA 4.n) and further division of complex technical areas shall be considered as complex technical areas.</p> <p>III. Qualification requirements for complex technical areas</p> <p>A. Educational background</p> <p>4. To be qualified for a complex technical area, a person shall have an educational background relevant to the CDM sectoral scope in which the complex technical area belongs.</p> <p>5. The following sector-specific educational backgrounds are relevant for the corresponding CDM sectoral scopes:</p> <p>(a) SS 6 (Construction): civil engineering or construction-related education, or</p>	<p>Ok, extended to 17 July 2013.</p>

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		<p>nical areas.</p> <p>III. Qualification requirements for complex technical areas</p> <p>A. Educational background</p> <p>3. To be qualified for a complex technical area, a person shall have an educational background relevant to the CDM sectoral scope in which the complex technical area belongs.</p> <p>5. The following sector specific educational background is relevant for the corresponding CDM sectoral scope:</p> <p>(a)SS 6 (Construction): civil engineering or construction related education, or equivalent;</p> <p>(b) SS 7 (Transport): transportation related education, or equivalent;</p> <p>(c) SS 14 (Afforestation and reforestation): forestry related education, or equivalent;</p> <p>(d) SS 15 (Agriculture): agriculture related education, or equivalent;</p> <p>(e) All other sectoral scopes: disciplines in sciences, engineering, economics, or equivalent.</p> <p>6. Educational background may be one or a combination of Advanced Diplomas, Bachelor, Master and higher or equivalent.</p> <p>B. Work experience</p> <p>7. To be qualified for a complex technical area, a person shall have at least three years of direct work experience in the field of the complex technical area.</p> <p>8. Direct work experience in the field for a complex technical area shall be gained through engagement with industries and involvement in the processes of specific facilities within the complex technical area, which may include direct research experience leading to gain specific knowledge in the technical area.</p>			<p>equivalent;</p> <p>(b) SS 7 (Transport): transportation-related education, or equivalent;</p> <p>(c) SS 14 (Afforestation and reforestation): forestry-related education, or equivalent;</p> <p>(d) SS 15 (Agriculture): agriculture-related education, or equivalent;</p> <p>(e) All other sectoral scopes: disciplines in sciences, engineering, economics, or equivalent.</p> <p>6. Educational background may be one or a combination of advanced diplomas, bachelor.s, master.s and higher degrees or equivalent.</p> <p>B. Work experience</p> <p>7. To be qualified for a complex technical area, a person shall have at least three years of direct work experience in the field of the complex technical area.</p> <p>8. Direct work experience in the field for a complex technical area shall be gained through engagement with industries and involvement in the processes of specific facilities within the complex technical area, which may include direct research experience leading to the gaining of specific knowledge in the technical area. Such engagement or direct research experience shall involve activities that allow knowledge of the processes, their interaction and different operating parameters in relation to the final output of the facility(ies).</p> <p>9. As a transitional measure for validation or verification contracts signed by 17 June 2013, a validation or verification team member of a DOE who was qualified prior to 17 March 2011 in a technical area that is defined as a complex technical area in this Standard is considered as complying with the requirements in paragraphs 7.8 in this Annex if:</p> <p>(a) The member worked as a technical expert, validator or verifier in this technical area in a team on at least three</p>	

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		<p>Such engagement or direct research experience shall involve activities that allow knowledge of the processes, their interaction and different operating parameters in relation to final output of facility(ies).</p> <p>9. As a transitional measure for validation or verification contracts signed by 17 March 2012, a validation or verification team member of a DOE who was qualified prior to 17 March 2011 in a technical area that is defined as a complex technical area in this Standard is considered as complying with this requirement if:</p> <p>(a) The member worked as a technical expert, validator or verifier in this technical area in a team on at least three validations or verifications, including participation in the associated site visits, within the three years prior to 17 March 2011; and</p> <p>(b) These validations or verifications resulted in the successful registration of the project activities or issuance of CERs before 17 March 2011.</p> <p>IV. Qualification requirements for non-complex technical areas</p> <p>A. Educational background</p> <p>10. To be qualified for a non-complex technical area, a person shall have an educational background relevant to the CDM sectoral scope in which the non-complex technical area belongs.</p> <p>11. The provisions contained in paragraphs 5–6 in this Annex apply to non-complex technical areas.</p> <p>B. Work experience and training</p> <p>12. To be qualified for a non-complex technical area, a person shall have</p>			<p>validations or verifications, including participation in the associated site visits, within the three years prior to 17 March 2011; and</p> <p>(b) These validations or verifications resulted in the successful registration of the project activities or issuance of CERs before 17 March 2011.</p> <p>6. The fulfilment of requirements for work experience relates to initial qualification of the AE/DOE personnel. The AE/DOE is responsible for establishing a system for continual monitoring the knowledge of its personnel qualified to the technical areas within sectoral scopes.</p> <p>IV. Qualification requirements for non-complex technical areas</p> <p>A. Educational background</p> <p>10. To be qualified for a non-complex technical area, a person shall have an educational background relevant to the CDM sectoral scope in which the non-complex technical area belongs.</p> <p>11. The provisions contained in paragraphs 5.6 in this Annex apply to non-complex technical areas.</p> <p>B. Work experience and training</p> <p>12. To be qualified for a non-complex technical area, a person shall have one of the three following:</p> <p>(a) At least one year of direct work experience in the field² of the non-complex technical area;</p> <p>(b) A combination of:</p> <p>(i) Related work experience, project management or consultancy; and</p> <p>(ii) Successful completion of a technical course and/or training programme ap-</p>	

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		<p>one of the three following:</p> <p>(a) At least one year of direct work experience in the field² of the non-complex technical area;</p> <p>(b) A combination of:</p> <p>i. Related work experience project management or consultancy; and</p> <p>ii. Successful completion of a technical course and/or training programme appropriate to the non-complex technical area;</p> <p>(c) A combination of:</p> <p>(i) Qualification through validation or verification activities by means of under-training and successful under-observation assessments in the non-complex technical area as follows:</p> <p>- Two validations or verifications as assessor under-training, accompanying a validator, verifier or technical expert already qualified for the technical area;</p> <p>- Followed by a successful performance of two validations or verifications under observation of a validator, verifier or technical expert already qualified in the technical area; and</p> <p>(ii) Successful completion of a technical course and/or training programme appropriate to the non-complex technical area.</p> <p>V. Other qualification requirements</p> <p>13. Qualification granted for a technical area is valid for other technical areas with the same nomenclature.³</p> <p>14. Qualification granted for a technical area is valid for both validation and verification/certification functions. However, the following knowledge or prior professional qualification should</p>			<p>appropriate to the non-complex technical area;</p> <p>(c) A combination of:</p> <p>(i) Qualification through validation or verification activities by means of under-training and successful under-observation assessments in the non-complex technical area as follows:</p> <p>- Two validations or verifications as validator, verifier or technical expert under-training, accompanying a validator, verifier or technical expert already qualified for the technical area;</p> <p>- Followed by a successful performance of two validations or verifications under observation of a validator, verifier or technical expert already qualified in the technical area; and</p> <p>(ii) Successful completion of a technical course and/or training programme appropriate to the non-complex technical area.</p> <p>V. Other qualification requirements</p> <p>13. Qualification granted for a technical area is valid for other technical areas with the same nomenclature.³</p> <p>14. Qualification granted for a technical area is valid for both validation and verification/certification functions. However, the following knowledge or prior professional qualification should be additionally considered to qualify personnel for a verification/certification function:</p> <p>(a) Instrumentation and metrological/calibration expertise; or</p> <p>(b) Management system (e.g. ISO 9001 or ISO 14001 or ISO 17025 or equivalent).</p> <p>15. It needs to be assessed if above</p>	

² Means of gaining direct working experience described in paragraph 8 above apply to non-complex technical areas.

³ For example, if a person becomes qualified for technical area TA 13.2 “Animal waste management”, this person becomes automatically qualified for TA 15.2 “Animal waste management”.

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		<p>be additionally considered to qualify personnel for verification/certification function:</p> <p>(a) Instrumentation and metrological/calibration expertise; or</p> <p>(b) Management system (e.g. ISO 9001 or ISO 14001 or ISO 17025 or equivalent).</p> <p>VI. Illustration of qualification requirements</p> <p>15. The following table illustrates the requirements for qualification for all technical areas.</p> <p>[Table]</p>			<p>requirement is fulfilled by any of the verification team members for the sectoral scope/technical area under verification to qualify the verification team.</p> <p>VI. Illustration of qualification requirements</p> <p>15. The following table illustrates the requirements for qualification for all technical areas.</p> <p>[Table]</p> <p>¹ <i>Complex technical areas involve more complex processes, operations and/or components.</i></p> <p>² <i>Means of gaining direct working experience described in paragraph 8 above apply to non-complex technical areas.</i></p> <p>³ <i>For example, if a person becomes qualified for technical area TA 13.2 .Animal waste management., this person becomes automatically qualified for TA 15.2 .Animal waste management..</i></p>	