

DOE/AE Forum

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

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 19 May, 2013
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Subject **Call for public input on "Issues included in the annotated agenda of the seventy-third meeting of the CDM Executive Board and its annexes"**

Honourable 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 focuses on those aspects within the annotated agenda with specific relevance for DOEs.

Draft standard: CDM accreditation standard (Annex 3)

We appreciate the recommendation made by the Accreditation Panel to request a further extension of the timeline for adopting the new version 5.0. As expressed during the DOE Forum's interaction with the panel it is of utmost necessity to create a document that can be applied for a long time span and that should have the potential to be utilised or adapted by other offset schemes. Many open "construction areas" clearly marked within the draft will hopefully see joint efforts and appropriate solutions, which are agreed by everybody. With regard to the envisioned further consultation with DOEs (June, July or August), we would appreciate an early fixing of the dates considering the coming holiday season in many countries.

Draft procedure: CDM accreditation procedure (Annex 14)

Although the DOE Forum would prefer a timely approval of this procedure, we still see a lot of issues that need further amendments or adjustments.

1. The procedure is not prepared for appropriate application with regard to very small or even non-operating entities. No performance assessment would be possible in case no new validation or verification activity is uploaded. Two prescribed regular surveillance audits per accreditation period may force some small entities to leave the market. A formulation like in the old standard (e.g. at least one, including conditions) might be advantageous.
2. Considering that regular performance assessments usually show mainly written communication between assessment teams and the concerned CDM management, it

might be useful to create a further possibility for direct communication after receiving observations by the assessment teams. Such direct communication should also be included in other assessment types.

3. The rationale for selecting more validations than verifications and different figures for adding performance assessments for larger entities should be provided.
4. The rationale of paragraph 25 (proceeding in cases of fraud or deliberate violation of accreditation requirements) is unclear. It appears as a short-cut towards suspensions and withdrawal of accreditation and misses any possibility of a hearing.
5. Furthermore the DOE Forum during the AP interaction requested to provide information on the foreseen composition of independent review teams (appendix 4) when appealing AP decisions. No such information/setting is provided.
6. The process for reviewing non-conformities (appendix 6) is not transparent because it misses any information on the required competences of the experts, as well as on which basis AP may decide not to establish an independent panel.

Considering these issues and the fact that there is still some undrafted text, we would appreciate a further loop of consultation with DOEs best in conjunction with the interaction for the Accreditation Standard, while its implementation and transition measures may run independently.

Documents on performance monitoring of DOEs (Annex 15)

While there is no preference regarding the use of a dynamic or a static method for the I_1 indicators, the setting of the control limits is essential for the image of the CDM as a whole. Seeing around one third of the DOEs in the yellow zone would deliver good arguments to all CDM critics. Both approaches when applied to entities with only one or two submission per monitoring period will almost unavoidable result in "flimmering" images of the belonging DOE performance statuses.

Furthermore some DOEs expressed concerns regarding the way of receiving information/feedback when entering the yellow or red zone for I_2 . Receiving only a score while not getting information of which requests for review a score is summed-up makes it sometimes difficult to perform an adequate root-cause-analysis. Therefore we recommend establishing the transmission of full information within the revised document.

Concept note on uncertainties of measurements in large-scale methodologies (Annex 4)

We recommend to amend the VVS or to draft guidance in parallel regarding the assessment of reported uncertainties by DOEs. At the time such uncertainties needs to be reported also DOE guidance should enter into force. It should also be noted that appendix 2 needs to be reformatted showing the correct symbols for the square and the square root.

Concept note on revision of the PoA related standard, guidelines, and procedures (Annex 10)

On issue 6 (Implications of changes to PDD form to the registered PoAs including for post-registration change requests) it is recommended taking into account the long term validity of PoAs which may see several changes in the underlying forms and "tracks" over this long period. Requiring frequent changes of the CPA forms might create difficulties when evaluating the flow of CPA registrations over a long period.

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On issue 9 (sampling for DOE validation/verification) it is deemed necessary, that, beside the flexibility in the verification of a sampling approach, some methods should be described as possibilities inter alia. This will avoid discussions whether a DOE has followed a guidance which would be there in case only a single approach is described.

Regarding issue 11 (Single sampling plan) it is considered essential to set clear criteria regarding stratification and the homogeneity within a strata. This seems not to be clear in the context of paragraph 61 of this annex.

More details on the addressed annexes/topics will be provided and hopefully discussed during the regular interaction.

Kind regards,

A handwritten signature in black ink, consisting of several overlapping loops and a central vertical stroke, resembling a stylized 'W' or 'B'.

Werner Betzenbichler
Chair of the DOE/AIE Forum