

JQA Comments on

DRAFT

Procedure for accrediting operational entities by the Executive Board of the clean development mechanism (CDM)

(15.06.2006)

DRAFT (Version 04)	Proposals	Remarks
<p>Contents</p> <p>A. Introduction</p> <p>B. Scope of accreditation</p> <p>C. Accreditation, unscheduled surveillance, re-accreditation and notification of changes</p> <p>C.1. Accreditation</p> <p>C.2. Unscheduled surveillance (“spot-check”)</p> <p>C.3. Re-accreditation</p> <p>C.4. Accreditation for additional “sectoral scope(s)”</p> <p>C.5. Procedure in case a letter is to be issued indicating the successful completion of the desk review and the on-site assessment</p> <p>C.6. Notification on change of status of a DOE</p> <p>D. Annexes</p> <p>D.1. Annex: "Application documents"</p> <p>D.2. Annex: “Appeals procedure”</p> <p>D.3. Annex: “Fees”</p>	<p>Contents</p> <p>A. Introduction</p> <p>B. Scope of accreditation</p> <p>C. Accreditation, unscheduled surveillance, re-accreditation and notification of changes</p> <p>C.1. Accreditation</p> <p><u>C.2. Desk Review</u> or <u>C.1.1. Desk Review</u></p> <p><u>C.3. On-site Assessment</u> or <u>C.1.2. On-site Assessment</u></p> <p><u>C.4. Witnessing Activities</u> or <u>C.1.3. Witnessing Activities</u></p> <p><u>C.5.</u> Unscheduled surveillance (“spot-check”) or <u>C.2.</u></p> <p><u>C.6.</u> Re-accreditation or <u>C.3.</u></p> <p><u>C.7.</u> Accreditation for additional “sectoral scope(s)” or <u>C.4.</u></p> <p><u>C.8.</u> Procedure in case a letter is to be issued indicating the successful completion of the desk review and the on-site assessment or <u>C.5.</u></p> <p><u>C.9.</u> Notification on change of status of a DOE or <u>C.6.</u></p>	<p>Modification</p> <p><u>Red color:</u> based on the numbers of chapter in the text.</p> <p><u>Blue color:</u> based on the context.</p>

<p>D.4. Annex: “Forms used in the CDM accreditation process” D.5. Annex: “Abbreviations”</p>	<p>D. Annexes D.1. Annex: "Application documents" D.2. Annex: “Appeals procedure” D.3. Annex: “Fees <u>and Costs</u>” D.4. Annex: “Forms used in the CDM accreditation process” D.5. Annex: “Abbreviations”</p>	
<p>3. Figure 1 provides the scheme for the CDM accreditation procedure. The responsibility of each actor in this scheme, as elaborated in section C. below, is as follows:</p> <p>3.4. A CDM assessment team, under the guidance of the CDM-AP, undertakes the detailed assessment of an AE and/or DOE, identifies non-conformities and reports to the CDM-AP. A CDM-AT shall be established by the CDM-AP which draws members from a roster of experts established by the EB for this purpose. For witnessing purposes, the team shall include a methodological expert.</p>	<p>3.4. A CDM assessment team, under the guidance of the CDM-AP, undertakes the detailed assessment of an AE and/or DOE, identifies non-conformities and reports to the CDM-AP. A CDM-AT shall be established by the CDM-AP which draws members from a roster of experts established by the EB for this purpose, <u>taking into account regional balance of CDM-AT and the location of AE/DOE</u>. For witnessing purposes, the team shall include a methodological expert.</p>	<p>Addition</p>
<p>B.1.1. Phasing of accreditation</p> <p>7. The accreditation of an operational entity may be undertaken in phases, <u>both in functions and sectoral scope(s) and shall be recommended on the basis of sectoral groups. The phasing of accreditation depends on the successful completion of a witnessing activity for a particular sectoral group and size of the project activity. The accreditation of an entity for</u></p>	<p>A diagram could help understanding.</p>	<p>(Clarification)</p>

<p>one function for a group of sectoral scopes may lead the entity for accreditation for the other function once the entity is accredited for the other function in the same or different sectoral group. If the accreditation for the other function is in other group of sectoral scopes, the entity may be accredited at the same time for the function in that sectoral group for which the entity is accredited in other function.</p>		
<p>8. An entity can only be accredited for its both functions, i-e validation and verification/certification, if a witnessing activity in a sectoral scope has been successfully undertaken, in each of the two functions, on the basis of one large scale project activity. In any event, before being accredited for both functions, the AE shall have successfully concluded the desk review, the on-site assessment and witnessing activities for the recommended sectoral scopes. The full accreditation shall only be granted to an AE once all validation and verification/certification activities have been successfully witnessed in accordance with the work plan related to the AE.</p>	<p>A diagram could help understanding.</p>	<p>(Clarification)</p>
<p>25. The secretariat shall check the completeness and adequacy of documents and information submitted against requirements. If the documentation is found incomplete, the secretariat shall inform the AE of the missing elements it has identified. The accreditation procedure shall be continued once all documentation is received.</p>	<p>The definitions of “adequacy” and “requirement” should be clarified.</p>	<p>Clarification</p>
<p>35. The team leader, in consultation with his team, shall identify, if necessary, which documentation is not adequate and therefore shall be provided by the AE. The team leader and the team members shall be guided by the principle that adequate documentation, as specified in the</p>		<p>Modification</p> <p>(The form “F-CDM-Addoc” is correct.</p>

<p>annex D1 “application documents”, shall be provided prior to the on-site assessment. Other clarifications and supporting documentation shall be provided during the on-site assessment. All issues of inadequacy shall be resolved. The CDM-AT shall request for any additional documentation by using the form (F-CDM-DOEt)</p>	<p>(last sentence) The CDM-AT shall request for any additional documentation by using the form (F-CDM-Addoc)</p>	<p>Please refer to D.4. Annex: “Forms used in the CDM accreditation process”)</p>
<p>36. The AE shall be informed, through the secretariat, of the missing documentation. The AE shall have a deadline of fourteen (14) working days to send documentation, required prior to the on-site assessment. If the AE does not provide such documentation within the deadline, the on-site assessment shall be planned and carried out in accordance with the procedure. However, additional time will be allocated during the on-site assessment to allow for the assessment of the missing required documentation on-site. Any additional cost resulting the extension shall be borne by the AE.</p>	<p>In the second sentence, “a deadline of fourteen (14) working days to send documentation” is mentioned, however the timing when the secretariat informs the AE should be noted.</p>	<p>Clarification</p>
<p>40. The on-site assessment shall consist of the following steps¹⁵: 40.2.3. Relevant decisions and clarifications issued by the EB and the CDM-AP¹⁷;</p>	<p>40.2.3. Relevant decisions and clarifications issued by the COP/MOP, the EB and the CDM-AP;</p>	<p>Addition</p>
<p>C.4. Witnessing Activities 48. The AE shall identify the witnessing activity(ies) by filling in the form for identification of witnessing activities (F-CDM-WOI). The team leader shall approve the proposed witnessing activities and prepare the work plan.</p>	<p>It should be clarified when the team leader prepares the work plan.</p>	<p>Clarification</p>
<p>78. The activities to be undertaken by the CDM-AT in the re-accreditation process shall include desk review of documentation, an assessment of work performed during the last accredited period, on-site assessment,</p>	<p>The activities to be undertaken by the CDM-AT in the re-accreditation process shall include desk review of documentation, an assessment of work performed during the</p>	<p>Modification</p>

<p>and a witnessing of a large-scale project activity for each function. The witnessing activity may be combined with the on-site assessment if such opportunity exists. This re-accreditation process shall be undertaken with a view to the EB making a decision regarding recommending redesignation, suspension, withdrawal and reduction of “sectoral scope(s)” of a DOE based on the recommendation of the CDM-AP.</p>	<p>last accredited period, on-site assessment, and a witnessing of a large-scale project activity for each function. The witnessing activity may be combined with the on-site assessment if such opportunity exists. <u>The witnessing activity may be undertaken, using a project activity(ies) under the ongoing validation and/or verification/certification that the DOE has already started performing. If a project activity(ies) validated by the DOE has been registered and/or the CERs from a project activity(ies) verified/certified by the DOE have been issued, the witnessing activity may not be undertaken.</u> This re-accreditation process shall be undertaken with a view to the EB making a decision regarding recommending redesignation, suspension, withdrawal and reduction of “sectoral scope(s)” of a DOE based on the recommendation of the CDM-AP.</p>	
--	--	--

Additional remarks
<p>The terms such as “entity(ies)”, “operational entity(ies)”, “applicant entity(ies)”, “designed operational entity(ies)”, “AE”, “DOE”, “AE/DOE”, “DOE/AE” could be used more consistently.</p>
<p>The terms “day(s)”, “working day(s)”, “week(s)” and “month(s)” are used. We suggest that definition and consistently use of these words should be made. (e.g. “Working days” should be explained taking into account how to count days. In addition, please clarify to which country the “working days” refers.)</p>