

Revised accreditation procedure for comments-updated version

Dear all,

Having reviewed the proposed procedure, DNV Certification will like to make the following comments: (Please disregard the message sent earlier today).

para 7: "If the accreditation of 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". This seems to be ok for accreditation for verification activities based on accreditation for validation activities, but not the other way around as this would contradict the phased accreditation principle.

para 15: Has the CDM AP the mandate to approve new scopes without consultations with the EB?

-The assessment of AE capacity and competence in paragraph 40 should be further elaborated to ensure that key aspects (additionality, leakage, boundary setting, completeness of monitoring measures etc) are included in the scope of assessment. We expect that the ATs will be equipped with some sort of checklist to ensure that sufficient comprehension of such key issues is in place for the AE while they perform their assessments. .

-The fee structure seems extremely biased: Even if assessment activities triggered are not substantiated by the later assessment, the DOE will have to pay the full cost. As long as such reviews can be triggered by another DOE, a NGO or any stakeholder, it seems biased to load all costs for this on the DOE. It seems hard for a DOE to keep control of fees that may occur as a consequence of the different activities. Further incentives for reducing the financial burden on AEs/DOEs should be considered.

-General: Deadlines for AT/AP/Secretariat responding back to AEs /DOEs should be included for all activities, not only the other way.

D.2, para 1: "The appeal may only address the qualification of the CDM-AT and/or non-compliance with procedures". If there are disagreements on the interpretation of a methodology, a DOE will have no choice than to accuse the CDM AP to be incompetent in order to appeal. Interpretation of methodology should be added as basis for appealing.

Best regards
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