



Mr. José Domingos Miguez
Chair, CDM Executive Board
UNFCCC Secretariat
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Re Call for input on the revised procedure for accrediting operational entities by the Executive Board of the CDM

Dear Mr. Miguez,

Through this letter, SGS would like to provide input on the revised procedure for accrediting operational entities by the Executive Board of the CDM, as requested during EB 24. We have identified some issues in the revised procedure, where we feel further clarification would be appreciated.

Paragraph 70.3

The text of the procedure specifies that the spot checks should be based on a written, substantiated complaint. In the revised procedure, considerations are mentioned which may trigger the spot check but the use of the term *inter alia* indicates that other considerations might also be taken into account. Because of the business interest for the DOE and the fact that the DOE is paying all the costs for the spot check, we would like to ask you to consider further clarifications on this point to ensure this process is as robust and transparent as possible. Options the Board might also consider is to give the considered DOE a possibility to respond before the spot check is initiated or only have the DOE pay for costs of the spot check if the complaint turns out to be justified.

Paragraph 78

The Board might want to consider providing further clarification on the witnessing of the functions during the re-accreditation especially on the following points:

- Timing of witnessing. Will witnessing take place by the AT during the onsite visit or can this also be performed before or after the onsite visit by the AT
- Nature of the witnessing. Will the witnessing consist of reviewing documentary evidence as per section C.4 of the procedure? If so, further clarification might be required to define the nature of the witnessing and differentiate between 'witnessing' and 'assessment of work performed during the last accredited period'.
- The procedure specifies that the witnessing will consists of a large scale project activity for each function. Can you confirm that this incorporates re-accreditation for Scope 14 and there is no separate witnessing for AR activities?

Section C.6

Further clarification would be appreciated on the timelines in the re-accreditation process, especially on the following points:

- What will happen if the re-accreditation process cannot be finished before the end date of the accreditation? Is there an extension period in case of delays in the process and will this depend on who is causing the delays, DOE or AT?
- If a DOE is re-accredited, what will be the start time of the new accreditation period. Would this be the end date of the original accreditation or the date the re-accreditation is confirmed by the Board?

Further clarification on these points in the final version of the procedure would be appreciated. Thank you for your consideration.

Yours sincerely

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