

*DOE/AIE Forum | Werner Betzenbichler | Bangkok, April 2011*

3rd CDM Roundtable  
“Programme of Activities (PoA)”  
- DOE Viewpoints

# Topics

- Existing Barriers
- Missing Rules
- Alternative Concepts

## Existing Barriers (for DOEs)

- Ambiguous guidance on additionality assessment
- Limited DOE competition due to varying interpretation of required minimum efforts
- Incalculable risks due to erroneous inclusion issue lead to full assessment of all CPAs and to increased transaction cost
- Longwinded, costly and questionable procedure for reviewing erroneous inclusion
- Who should detect and report such cases?

Few incentives to give momentum to further business development  
(dealt by a limited group of experts within some DOEs)

## **Missing Rules (for DOEs)**

- Consistency with our guidance/procedures (e.g. some rules are even not yet existing / applicable)
- Practicable application of sampling approach in verification
- The same for consistency at check CPA inclusion
- Approved/Registered PoA-specific verification plans + procedure for its revision/improvement
- The same for consistency check at CPA inclusion
- A procedure to replace the “initial CPA” at validation

## Alternative concepts

- clear responsibility in the performance, monitoring, CPA inclusion and verification is given to the Coordinating and Managing Entity (including responsibility for erroneous inclusion)
- initial set of documents with non-ambiguous instructions at registration, including CPA inclusion and verification checklists
- CPA verifications and inclusions of new CPAs in parallel by the same DOE
- No responsibility for CPAs not covered in a documented sample; level of assurance based on the assumption, that results of a limited sample extent can be extrapolated
- DOE liability to be covered under “Significant Deficiencies Issue”, which should refer to fraud, malfeasance or gross negligence

## **Focus of DOE assessments in the alternative concept**

- the appropriate implementation of the PoA with regard to technological aspects;
- the system and internal checks for CPA inclusion, its implementation and its effectiveness;
- the system for monitoring of the required parameter, its implementation and its effectiveness;
- the system for internal verification, its implementation and its effectiveness;
- a confirmation of the amount of CERs that can be certified at a reasonable level of assurance taking into account the fact that the result is based on the assessment of samples

Werner Betzenbichler  
Chair of the DOE/AIE Forum  
on behalf of TÜV NORD

Designated Operational Entities and Independent Entities Association ▪ [Werner.Betzenbichler@bece-experts.com](mailto:Werner.Betzenbichler@bece-experts.com)