



Designated Operational Entities  
& Independent Entities Association

# Revisions to the accreditation standard and accreditation procedure

7<sup>th</sup> CDM Roundtable, 20 April 2013  
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# Generic Comments

- ❖ **Important objectives for DOEs in the context of the revisions**
  - reduce the administrative burden on DOEs, thus hopefully reducing costs for light of new market conditions
  - provide a platform for more consistent performance by AT members
  - ensure a more stable business platform for DOE operations

# Generic Comments (2)

- ❖ Acknowledgement that Secretariat has put a lot of hard work into these revisions
- ❖ Timeline for approval by EB-73 appears (too) ambitious
- ❖ Zero drafts require further work
- ❖ What about impacts/interferences by the review of the Marrakech Accords?

# Specifics - Competence Requirement

- ❖ Some DOE's expressed to be scared regarding possible NC's in case of assessment
- ❖ Still a risk of impacts on transaction costs  
e.g. ACM0003 would refer to 4 new scopes (8, 1, 25, 30)  
AM0082 even refers to 6 scopes
- ❖ Might require some or many entity to withdraw accreditation of sectoral scopes
- ❖ Implementation to be proven e.g. at next regular surveillance or reaccreditation audit with a minimum transition period of 12+ months

# Specifics – Other Aspects in Standard

- ❖ Contractual Relationship to clients still not according to business needs
- ❖ Publication of procedure to allocate responsibility is unusual (para 98)
- ❖ May hinder changes of auditors from one DOE to another because of Col provisions (162, d, ii)
- ❖ Implementation to be proven e.g. at next regular surveillance or reaccreditation audit with a minimum transition period of 12+ months

# Specifics –Aspects in Procedure

- ❖ (Interim) Complaint procedure against EB decision has been requested
- ❖ How independent is the independent review of CDM-AP recommendations?
- ❖ Scope of spot-check appears rather ambiguous
- ❖ Some definitions are missing, e.g. critical systematic persistent failure
- ❖ Still some leeway to assessment teams
- ❖ We welcome the introduction of a request to review of a final assessment report
- ❖ Avoid Col of AT by self-generation of work-load

# Specifics –Performance Assessment

- ❖ We object the overlap of assessment which are considered to be independent
- ❖ Recommend an early scheduling within a some months period
- ❖ How to deal with small (even non-busy) entities
- ❖ Revision of fee structure is recommended
  - Invoices by UNFCCC
  - Lump sum to cover travel expenses
  - Re-visits only on exceptional cases

**Thank you.**

