Revisions to the accreditation standard and accreditation procedure

7th CDM Roundtable, 20 April 2013
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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 CoI 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
(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 CoI 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.