

STATUS OF FEEDBACK TO 7th CDM ROUNDTABLE - ACCREDITATION PROCEDURE/ ACCREDITATION STANDARD

ACCREDITATION PROCEDURE

STAKEHOLDER INPUT	STATUS OF CONSIDERATION OF INPUT		
	INCORPORATED INTO ONGOING WORK/DOCUMENT/PRODUCT	<u>NOT</u> INCORPORATED INTO ONGOING WORK / DOCUMENT/PRODUCT	OUTCOME IN PROGRESS
<p>Re: <i>Modalities to determine the number of performance assessments</i></p> <p>Recommend a hybrid option taking into account: Mandatory basis of PAs, volume of work Outcomes of the Performance Monitoring (not the number of accredited sectoral scopes)</p> <p>Implement some enabling or capacity-building measures (outside the Procedure)</p>	<p>Addressed in paragraph 80 of the Draft Procedure: CDM accreditation procedure Version 11.0 (EB73). Please refer to: http://cdm.unfccc.int/filestorage/g/c/HFAC7DP032GTV1QL8WN6JMEYKOBXZ4.pdf/eb73_propan14.pdf?t=VHI8bW84OHI2fDCz5PSEutJPZp_5QuE9HIQs</p>	<p>Second point is considered to be outside the scope of this revision.</p>	
<p>Clarify:</p> <ul style="list-style-type: none"> - Critical NC - Recurring NC (time, entity/group companies, requirements) 	<p>Addressed in para 8. of the Draft Procedure: CDM accreditation procedure Version 11.0 (EB73). See Para 8. Para 25 has been improved accordingly. See http://cdm.unfccc.int/filestorage/g/c/HFAC7DP032GTV1QL8WN6JMEYKOBXZ4.pdf/eb73_propan14.pdf?t=VHI8bW84OHI2fDCz5PSEutJPZp_5QuE9HIQs</p>		<p>In addition, in relation to this matter, the Board at EB73 requested the secretariat that the provision for handling cases where fraudulent behaviour by a DOE is found during an accreditation assessment should be elaborated.</p>
<p>Clarify whether an on-site assessment should always be conducted to lift an "under-observation"</p>			<p>As per Appendix 2 and modalities for closing NCs, on-site assessments are not always requested to lift "under-observation". However, it is recognised that further work is required to clarify the requirement. This will be made explicit in the document.</p>
<p>Define/adjust the process for lifting an "under-observation" as a result of not following a provision of the Procedure</p>			<p>The Board at EB73 requested the secretariat that the cases where under-observation status is triggered due to a failure to follow the accreditation procedure should be clearly covered in the section on handling the under-observation status. This request will be addressed in the final version of the document.</p>

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Consider positive measures to incentivise good performance		This recommendation was considered to be outside the scope the revision of this document. However, the secretariat made these suggestions available to the Chair and Vice chair of the CDM AP, who can then decide whether or not to bring this suggestion forward once again as appropriate to the Board at future meetings for further consideration.	
Ensure the independency of the panel and experts selected			This recommendation was discussed at EB73 as currently under further consideration. While there was no consensus by the Board as to what could be possible additional measures to ensure the independency of the panel and experts selected based on specified criterion (Skills, competence and impartiality aspects), the Board recognized that this is a long standing dilemma between the need to access adequate level of expertise and the impartiality and independence of review panel members.
The independent panel should recommend whether the AP recommendation should be upheld (rather than the EB)		The panel of experts will conduct a review of an adverse recommendation where the AE/DOE considers the adverse recommendation is in breach of the CDM accreditation standard and/or this Procedure and the EB will consider the request for review with all supporting documentation submitted by the AE/DOE, the adverse recommendation, the review panel report, and any other relevant documentation, and decide one of the options in Appendix 2, para 19. a) and b). In this context, the Board can over right the recommendation of the review panel as appropriate.	
The final EB decision should follow the assumption that the independent panel's recommendation is upheld		Same as above	
Ensure rotation of CDM-ATs for different assessments of a same DOE (to avoid familiarity, COI)		Outside the scope of this revision. This input could be considered in the context of the revision of operational guidance for the selection of CDM AT members.	

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Review the structure of fees – suggested standard fixed cost for Pas, and pay directly to the UNFCCC rather than individuals			Further work remains to be done in the section relevant to fees and costs (Appendix 7).
Ensure calibration of CDM-Ats		Suggestion well taken and will be considered in the context of operational planning. However, these actions are considered to be outside the scope of the revision of this procedure.	
The sectoral technical knowledge may be too prescriptive, or not all the prescribed knowledge in a given SS should be required			This issue is currently under further consideration. List of sectoral scopes, as defined in Appendix 1 – the number of revised sectoral scopes (increased from 16 currently to 31) has been perceived as very high. However, it is important to note that with the removal of technical areas (currently 26), the current number of sectoral scopes will inevitably increase in order to maintain the technical specificity of competence requirements. Appendix 1. Sectoral scopes and sector technical knowledge in the First Draft CDM accreditation standard ver05.0 - for EB73 is still under revision. http://cdm.unfccc.int/filestorage/g/c/HFAC7DP032GTV1QL8WN6JMEYKOBXZ4.pdf/eb73_propan14.pdf?t=VHl8bW84OHI2fDCz5PS EutJPZp_5QuE9HIQs
There should not be two systems/approaches for competence qualification system running in parallel			This issue is currently under further consideration..The Board at EB73 considered the draft revised “CDM accreditation standard” and provided feedback to be taken into account by the secretariat in preparing the further draft to be considered by the Board at its seventy-fifth meeting.The Board provided the following specific guidance: The means for applicant entities (AEs) and DOEs to evaluate and demonstrate compliance with the knowledge-based competence requirements should be modified so that this requirement can be met and enforced in a consistent manner across AEs/DOEs.

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Grandfathering of already qualified personnel should be applied			The Board at EB73 considered the draft revised “CDM accreditation standard” and provided feedback to be taken into account by the secretariat in preparing the further draft to be considered by the Board at its seventy-fifth meeting. The Board provided the following specific guidance: the transition from the current to the revised standard should be designed so as to reduce cost implications for AEs/DOEs, including the grandfathering of qualification to personnel already qualified under the current standard for the corresponding functions and sectoral scopes;
The necessity of having all SS expertise for on-site visits should be reviewed			Demonstration of competence, as defined in paragraph 93 – a challenge inherent to a knowledge-based approach for competence requirements is the demonstration for a person that he/she actually has the required knowledge and skills, and the ability to apply knowledge and skills. The means to demonstrate such competence will be elaborated as requested by the Board at EB73 so as to ensure a consistent implementation across DOEs and a consistent and fair assessment by CDM assessment teams. Some guidelines may also be needed to supplement the Standard in this regard. The first draft revised Standard (see http://cdm.unfccc.int/filestorage/w/0/HGC8IDUJSK9M43NPW6BAZX5LFE2R10.pdf/eb73_propan03.pdf?t=Qll8bW84bG1vfDCe1qKOs29aVTuX-TPmvY6P) contains some proposed requirements on all of these aspects, but this is still work-in-progress. The proposals are not final, and as it is indicated in the draft at the beginning of sections 10.2.3, paragraphs 93 and 122(d), and appendices 1 and 2, these areas are still to be reviewed.
The proposal in paragraph 56(a): <i>“In each sectoral scope that an AE/DOE has applied for accreditation or has been accredited, the AE/DOE shall evaluate and demonstrate competence of its personnel: Through an evaluation of actual performance in validation and/or verification/certification activities”</i> for demonstrating competence should be reviewed			The Board at EB73 considered the draft revised “CDM accreditation standard” and provided feedback to be taken into account by the secretariat in preparing the further draft to be considered by the Board at its seventy-fifth meeting. The Board provided the following specific guidance: The means for applicant entities (AEs) and DOEs to evaluate and demonstrate compliance with the knowledge-based competence requirements should be modified so that this requirement can be met and enforced in a consistent manner across AEs/DOEs.

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<p>The approach in 56(b) <i>"In each sectoral scope that an AE/DOE has applied for accreditation or has been accredited, the AE/DOE shall evaluate and demonstrate competence of its personnel: One or more methods from the following, but not limited to: Education, training and qualification; Work experience; Examinations and interviews; Mentoring; On-the-job observation."</i></p> <p>is ok, but more practical guidelines should be provided</p>			
<p>Outsourcing to non-group companies (for technical expertise) could be removed</p>			<p>The Board at EB73 considered the draft revised "CDM accreditation standard" and provided feedback to be taken into account by the secretariat in preparing the further draft to be considered by the Board at its seventy-fifth meeting. The Board provided the following specific guidance: Outsourcing of all functions that may be outsourced should be allowed to any other legal entities.</p>

Stakeholder inputs from 7th CDM Roundtable: Improvements to the standard on sampling and surveys including best practice examples and further work on streamlining regulatory requirements of PoAs based on lessons learned

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Re: single sampling plan for a group of CPAs			
Provide guidance/criteria to define homogeneity and degree of stratification			EB73, para 48 (h): With regard to single sampling plans, the Board agreed to request the secretariat to develop clearer criteria on stratification and homogeneity, providing examples where possible; The draft revised sampling standard/guidelines are to be presented to EB74.
Allow for amendments to original sampling plan established in the PDD			
Provide practical examples of homogeneity for common types of PoAs, followed by standard			
Provide clearer step-wise guidance on choice of statistical approaches, underpinned by examples			
Re: pragmatic approaches to deviations from targeted precision level			
Allow for two approaches: Discounting (either by lower/upper bound or default discounts) Use conservative default values provided in the methodology			EB73, para 48 (c): With regard to pragmatic approaches to meet predefined reliability targets, the Board agreed that both discounting and the use of conservative default factors in methodologies should be included as options for the project proponents to choose from; The draft revised sampling standard is to be presented to EB74.
Clarify that application of deviation procedure is not necessary			

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Re: application of the sampling standard to early mover PoAs			
Consider some type of grace period for projects which have started the PoA with the interpretation of “absolute” precision			EB73, para 48 (f): With regard to the application of the sampling standard to early-mover PoAs, the Board indicated a preference to allow a grace period before which the application of relative precision becomes mandatory (e.g. when 90/10 confidence/precision is indicated for a sampling effort, 10 per cent precision indicated will be considered as relative precision and not as absolute precision after the grace period); The draft revised sampling standard is to be presented to EB74.
Re: sampling for DOE validation/verification			
Propose three criteria to trigger on-site visits: a) <i>Volume of emission reductions (only “large” projects)</i> b) <i>DOE judgment (with some guiding criteria)</i> c) Require on-site visits but the number of visits dependent on a set of criteria (size, quality of CME monitoring system, etc)			EB73, para 48 (g): With regard to sampling for DOE validation/verification, the Board agreed that the secretariat should explore alternative options to acceptance sampling. In this regard the Board indicated a preference for the option that requires on-site visits by a DOE determined on the basis of a set of criteria (e.g. project size, location, quality of coordinating/managing entity monitoring system, etc.); The draft revised sampling standard is to be presented to EB74.

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Re: generic CPA-DDs per CPA type; how to define CPA type			
Allow cross-reference without repeating all sections of generic CPA-DD			EB73, para 48 (e): With regard to the separate generic CPA design documents (CPA-DDs) for each CPA type, the Board agreed to allow cross-referencing to avoid repeating every section of the CPA-DD; The draft revised PS/VVS/PCP, PoA-DD guidelines are to be presented to EB74.
Re: deviation request for a single CPA holding up issuance for all other CPAs			
Allow delayed CPA to request issuance later in a separate monitoring report, covering the same period (implicitly allowing more than one monitoring report for the same period).			EB73, para 48 (b): The Board considered the difficulties associated with the requirements for synchronized issuance requests for CPAs of a PoA indicated by stakeholders and agreed to request the secretariat to continue assessing the issue with a view to finding a solution; for any potential solution that the secretariat identifies, the secretariat should estimate the time and resource requirements needed to adjust the workflow system; Secretariat is continuing to assess the issue with priority, depending on the nature of any solution found and its impact on the workflow, will present recommendation to the Board at a future meeting of the Board.
Re: inclusion of an additional measure/technology to an already-included CPA			
Create a simple procedure to include a compatible measure/technology and first real-case CPA-DD, which is different from the Post Registration Change procedure			Secretariat will continue the analysis and present the recommendation at a future meeting of the Board.
Create a procedure to include a new additional measure/technology and methodologies involving more steps (EIA, LSC, GSC, LoA?)			

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Re: definition of the CPA for dispersed technologies/units			
Use methodological approaches that can evaluate emission reductions for the whole program, and not for the individual CPAs (e.g. large scale meth with conservative defaults, positive list)			EB73, para 48 (d): With regard to the definition of a CPA for dispersed technologies/units, the Board agreed that the proposed development of simplified large-scale methodologies for small units under the CDM-MAP 2013 would address the issue and that separate efforts would not be required;