Draft Revision to the Accreditation Standard

9th CDM Roundtable, 23 August 2013
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Contents

- Generic Comments
- Issues requiring clarification
- Issues requiring corrections
- Issues requiring amendments
- Discussion of offered options
Generic Comments

Key Principles for new AS

- Widening of the pool of potentially qualified persons
- Should support harmonization/calibration measures
- Protection of vested rights (of DOEs, PPs and individuals)
- ‘Easy’ to implement
- Cost-effectiveness (considering market situation)
- Reduction of subjectivity
- Maintenance of supply for infrequent applied meths
Timeline

- Implementation depends on final decision
- Promised ‘guidance for the demonstration and evaluation of competence’ is not even drafted
- Integral part of the package → required for ‘final acceptance’
- Later adoption with faster implementation appears as preferred route
Clarification requested

- **Contract review**
  - Provisions on treatment of group companies disappeared [para 48. (b) refers to CDM only]

- **Outsourcing**
  - Differences to external individuals are partly vague [e.g. para 65. (b) and 59]
  - Could an entity act as outsourced body of several DOEs? [para 68]

- **Competence requirements**
  - Lawyers in CCS validation and verification [para 80 and 84]
  - Financial experts seems to be doubled [para 84]
  - How to proof knowledge in QMS/EnMS [para 85]
Clarification requested (2)

- Technical review teams
  - Are technical experts considered as members of TR teams? [para 91]

- Demonstration of competence
  - Has at least one of the listed options to be applied? [para 96]

- Competence Monitoring
  - Definition of on-the-job performance evaluation [para 101 (a)]

- Selection of teams
  - Expectations in team selection documentation [para 123]
List of scopes and technical knowledge

- Technical knowledge delivers a further division of sectoral scope. What coverage is requested in accreditation? [Appendix 1]
Legal status

- National law of host countries is not always relevant; contracts with other parties or reference to international law [para 11]

Entity’s management

- Management to rule not necessarily to conduct the preparation of quotations; this also contradicts fact that this function can be outsourced [para 23. (c)]

Human resources

- Management personnel on full-time basis restricts employment options [para 54 and footnote 7]
Correction requested (2)

- **Competence**
  - Deleted ‘collectively’ to be re-established [para 76ff]
  - Requested competence in sustainable development contradicts scope of validation [para 79b]

- **Technical experts**
  - Familiarity with documented procedures not necessary [para 93]

- **Competence Monitoring**
  - Duplication of monitoring activities [para 101 (b) and 96 (a)]
Correction requested (3)

- **Contract review**
  - List of necessary documents appears to exhaustive [para 115]

- **Corrective actions**
  - V&V reports do not raise non-conformities of a DOE’s MS [para 149]

- **Transitional Provisions**
  - Accreditation assessments to follow individually applied version (4 or 5) during a transitional period [para 169. (d)]
Amendments requested

 Definitions

- When mentioning conditions (e.g. ‘if needed’) then reference should be made to the relevant guidance [e.g. para 8. (t) and 8 (v)]

 Safeguarding impartiality

- Provisions on treatment of group companies disappeared [para 48. (b) refers to CDM only]
- Different teams in validation and verification of the same CDM activity [para 48. (e)]
  - equal treatment is requested (small/large entities)
  - How to deal with auditors who change the DOE?
  - Is ‘Board authorization’ given for SCC?
  - Dealing with familiarity risk is essential
Amendments requested (2)

- **External individuals**
  - Option to contract via outsourced body got lost [para 60]

- **Outsourcing**
  - To include document and record management [para 65]

- **Demonstration of competence**
  - Avoid automatism of losing scopes when people leave an entity [para 97]
Amendments requested (3)

- **Validation and verification**
  - Reference to VVS on site-visit requirements [para 126 (c)]
  - Clear definition on minimum coverage of scopes by on-site teams [para 126 (c)]

- **Transitional Provisions**
  - Classification of methodologies with principle (main) scope(s) [para 169. (c)]
Preferred Options

Transitional Provisions

- Grandfathering of qualifications of individuals
  [para 169. (a) (i) a.]

- Grandfathering regarding scopes of accreditation
  [para 169. (b) (i) a.]

- Classification of methodologies should not have an impact on publications and submissions
  [para 169. (c)]

- Accreditation assessment to be based on actual, individual implementation of V5, not on specific dates
  [para 169. (d)]
Thank you.