

Draft Revision to the Accreditation Standard

9th CDM Roundtable, 23 August 2013 Werner Betzenbichler

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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



Generic Comments (2)

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]



Clarification requested (3)

List of scopes and technical knowledge

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



Correction requested

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.

