

EB 51

Relations with Designated Operational
and Applicant Entities

DOE Forum Inputs

□ **Defining technical areas within the sectoral scopes**

Paragraph 57 of the CDM Accreditation standard (EB48, Annex 2) is related to qualification of validators/verifiers for technical areas within the sectoral scopes, it states:

The qualification system shall include the following criteria:

- *Direct working experience, gained through employment, involvement in consultancy or project development in a specific technical area within a sectoral scope; and*
- *For additional technical area, observation of at least two validation or verification activities within the sectoral scope*

Defining technical areas within the sectoral scopes (Contd.)

Issue:

- ❑ The definition of technical areas within the sectoral scopes is not elaborated in any of the accreditation related documents (Standard/Procedure)
- ❑ DOE's recognise the importance of expertise for specific technical areas within the sectoral scope, but the absence of a defined list of the technical areas leads to subjective definition and interpretation
- ❑ Expertise in some technical areas can be gained through related education and validation/verification (auditing) experience

Suggestion:

- ❑ Technical Areas and competence criteria corresponding to each technical area have been assessed and accepted by UNFCCC for all accredited DOEs. A standard can be drafted through compilation of these technical areas and competence criteria
- ❑ DOEs request involvement in this process for defining the technical areas and corresponding competence criteria

Conflict of Interest - DOEs

Issue: Suggested revision to Accreditation Standard set out in Paragraph 11 C of the EB 50 minutes

'Revision of the accreditation standards to prohibit AE/DOEs from performing the validation/verification of project activities belonging to the same client and/or PPs for which any activity, apart from third party conformity assessment but excluding testing and calibration, has been carried out by itself or a related body'

- ❑ DOE have robust procedures to ensure that potential threats to impartiality are analyzed at an organizational, project and individual level
- ❑ The revision that is being provided will exclude many competent DOEs on the basis of organizational structure alone

Suggestion:

- ❑ If a concern has been identified a root cause assessment should be undertaken
- ❑ Additional consideration should be given to this proposed amendment

Validation and Verification Timelines

EB45 submission

- ❑ Undertake validation and provide draft validation report (findings) to Project Proponent within 90 days given that site visit/interviews can be scheduled within 2-3 weeks after 30 days publishing of the PDD (International Stakeholder Consultation Period).
- ❑ Request Registration within 6 months after PDD was published given that the Project Proponent's response to a CAR/CL was sufficient to close the issues raised in draft validation report with 30 days of its receipt

Reasons for long validation timelines:

- ❑ CARs & CLs remain open in the absence of adequate information
- ❑ Other issues like delays in LoA, meth expiry etc.
- ❑ DOEs introduced time bound schedules in recent contracts

EB engagement and consultation with DOEs

- ❑ DOEs are legal entities (outside the UN system) but they are the 'extended arm' of the CDM EB
- ❑ Tightening the system should not necessarily mean 'denial of accreditations/suspensions'
- ❑ Enabling measures needed- DOEs have grown with the system and it has been a 'learning by doing' process
- ❑ 'Blame it on DOE' approach- Detrimental to the CDM system as a whole
- ❑ DOEs need EB's help and are willing to engage!