



**INPUTS TO THE FIRST DRAFT  
JOINT IMPLEMENTATION ACCREDITATION STANDARD**



**Your information**

<i>Name (first name - family name)</i>	<b>TUEV-SUED</b>
<i>Affiliation</i>	<b>TUEV-SUED</b>
<i>Address</i>	<b>TÜV SÜD Industrie Service GmbH Westendst. 199 80686 München Germany</b>
<i>Telephone</i>	<b>+49 89 5791-1733</b>
<i>Email</i>	<b><a href="mailto:manja.welzel@tuev-sued.de">manja.welzel@tuev-sued.de</a></b>
<i>Practical experience in using similar standards, if any (brief summary)</i>	<b>CDM ISO 14065</b>

*Please provide your inputs on the first draft Joint implementation accreditation standard, which can be found on the call page.*

**Input (1): General remarks (optional)**

*<Please provide your comments of cross-cutting nature regarding the contents of the first draft Joint implementation accreditation standard, if any.>*

*Please clarify the terms of “documented procedure”(DP) and “procedure”(P) throughout the document and please check if a DP or P really wanted/needed or a proof is sufficient.*

**Input (2): Inputs on the first draft Joint implementation accreditation standard (Add or remove rows according to your needs.)**

Section and paragraph	Proposed change to or comment on the draft text and rationale, as appropriate
I.C §6 - 8	The period of three months will be only enough if it is taken after a training of the IEs regarding the correct understanding of the accreditation standard. In any other case in order to avoid misinterpretation and discussions the period should be expanded to 6 months and a open forum for question and answers should be open during at least the first 3 months of this period to ensure same understanding in all levels.
I.E §16	The reason to include “contracts” and “marketing material” under the definition of determination or verification work is not clear, as this can be related to company strategies or confidential information which will not affect the correct performance of a determination or verification work. Please clarify.
III.A §33	How you define demonstrate (how, when, in which way, upon request or periodically, etc. Please clarify.
IV.B §40	The benefit of this public availability is not clear. Please delete this term.
IV.B §41 – 45, 79B	Please be consistent through the whole document with the definition of 41 / 42 or compile both to one or add a matrix of responsibilities as annex to the standard. 41 / 42 are describing the same requirements. 45: please define committee or body.
VI GENERAL	Definitions of competence and requirements of auditors, team leaders and reviewers are missing in general Team composition is missing
“TECHNICAL AREA”: VI.A §53 D, 56 B + C	In order to have the same understanding between the different IEs and to assure the correct understanding of the requirements it is needed to clarify and define the technical areas within each sectoral scope. The use of different approaches to define technical areas will result in a different level of work between the different IEs. Hence the integrity of the system could negatively be affected. Please define TAs.
VI.B §54	This requirement is in contradiction with the possibility to use external personnel. It is not feasible that an IE will employ directly every person that will work in JI activities, hence the propose text is: <b>“An IE shall employ a sufficient number of competent personnel, including determiners, verifiers, determination and verification team leaders, technical experts and internal reviewers and assure the availability of external personnel, if necessary, to perform all determination or verification work,...”</b>

VI.B §58	The management cannot cover all sectoral scopes. If you are consistent in 41 and 41 there is no need for this paragraph. OR please be consistent in tasks and responsibilities and functions.
VI.D § 60 (E)	This requirement implicitly mentions the necessity to include in the team personnel that can communicate in local languages. If we take as example Russia or GIS countries there are more than 50 local languages and it cannot be expected that any team will be able to always cover the local language. Proposed text: “English and/or any other languages so as to be able to communicate with clients and local stakeholders and if necessary use translators”.
VII.A §79 B	This issue is in contradiction to 41/42.
VII.C §83 A	We welcome this fact, but in reality it is nearly impossible to force clients to respond to or to close CARs/CRs following a fixed time schedule. Due to the actual length of a project activity it is impossible to define (block) a reviewer already at the beginning of the project.
VII.C §86	No definition of reviewer’s competence in paragraph 58. 58 refers to 41/42 (see above)
VII.C §89	Please clarify this issue.
VIII.E §99 AND §101	Please revise 99 – 101 and compile it to one procedure.

**Please submit the form through the call web page.**